

Message

From: Glynn, Tara [Glynn.Tara@epa.gov]
Sent: 8/13/2019 6:07:01 PM
To: Armstead, John A. [Armstead.John@epa.gov]; Brees, Angela [Brees.Angela@epa.gov]; Driscoll, Stacie [Driscoll.Stacie@epa.gov]; Hestmark, Martin [Hestmark.Martin@epa.gov]; Hyde, Tinka [hyde.tinka@epa.gov]; Iglesias, Ariel [Iglesias.Ariel@epa.gov]; Mitchell, Judy-Ann [Mitchell.Judy-Ann@epa.gov]; Monell, Carol [Monell.Carol@epa.gov]; Alford, Cecilia [alford.cecilia@epa.gov]; Smith, John [Smith.John@epa.gov]; Barmakian, Nancy [Barmakian.Nancy@epa.gov]; Conway, Timothy [Conway.Tim@epa.gov]; Crossland, Ronnie [Crossland.Ronnie@epa.gov]; Daly, Carl [Daly.Carl@epa.gov]; Davies, Lauris [Davies.Lauris@epa.gov]; Dwyer, Stacey [Dwyer.Stacey@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Gorman, John [Gorman.John@epa.gov]; Hamlin, Tim [Hamlin.Tim@epa.gov]; Hastings, Janis [Hastings.Janis@epa.gov]; Huffman, Diane [Huffman.Diane@epa.gov]; Johnson, Kathleen [Johnson.Kathleen@epa.gov]; Kowalski, Edward [Kowalski.Edward@epa.gov]; Lombardo, Ginny [Lombardo.Ginny@epa.gov]; McGuire, Karen [Mcguire.Karen@epa.gov]; Robichaud, Jeffery [Robichaud.Jeffery@epa.gov]; Scott, Jeff [Scott.Jeff@epa.gov]; Seager, Cheryl [Seager.Cheryl@epa.gov]; Snowbarger, Robert [Snowbarger.Robert@epa.gov]; Taylor, Katherine [Taylor.Katherine@epa.gov]; TROMBADORE, CLAIRE [Trombadore.Claire@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Dunn, Alexandra [dunn.alexandra@epa.gov]; Kadeli, Lek [Kadeli.Lek@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]; Wise, Louise [Wise.Louise@epa.gov]; Ellis, Frank [Ellis.Frank@epa.gov]; Hebert, John [Hebert.John@epa.gov]; Hutchens, Timothy [Hutchens.Timothy@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Mosby, Jackie [Mosby.Jackie@epa.gov]; Parrott, Patricia [parrott.patricia@epa.gov]; Wire, Cindy [Wire.Cindy@epa.gov]; Wormell, Lance [Wormell.Lance@epa.gov]; Burns, Mike [Burns.Mike@epa.gov]; Frazer, Brian [Frazer.Brian@epa.gov]; Hartman, Mark [Hartman.Mark@epa.gov]; Henry, Tala [Henry.Tala@epa.gov]; Kapust, Edna [Kapust.Edna@epa.gov]; Morris, Jeff [Morris.Jeff@epa.gov]; Mottley, Tanya [Mottley.Tanya@epa.gov]; Myrick, Pamela [Myrick.Pamela@epa.gov]; Reisman, Larry [Reisman.Larry@epa.gov]; Richardson, Vickie [Richardson.Vickie@epa.gov]; Symmes, Brian [Symmes.Brian@epa.gov]; Tillman, Thomas [Tillman.Thomas@epa.gov]; Vendinello, Lynn [Vendinello.Lynn@epa.gov]; Widawsky, David [Widawsky.David@epa.gov]; Denman, Bill [Denman.Bill@epa.gov]; El-Abdaoui, Fatima [El-Abdaoui.Fatima@epa.gov]; Ireland, Scott [ireland.scott@epa.gov]; Pardue-Welch, Kimberly [Pardue-Welch.Kimberly@epa.gov]; Rosado-Chaparro, Wilfredo [Rosado-Chaparro.Wilfredo@epa.gov]; Smith, Monica [smith.monica@epa.gov]; Chow, James [chow.james@epa.gov]; Goetz, Mary [goetz.mary@epa.gov]; Green, Jamie [Green.Jamie@epa.gov]; Klevs, Mardi [klevs.mardi@epa.gov]; Lininger, Don [Lininger.Don@epa.gov]; Moore, Tammy [moore.tammy@epa.gov]; Rea, Kristi [Rea.Kristi@epa.gov]; Toney, Anthony [Toney.Anthony@epa.gov]; Winters, Melissa [Winters.Melissa@epa.gov]; Wesson, Dolores [Wesson.Dolores@epa.gov]; Price, Michelle [Price.Michelle@epa.gov]; Morlock, Nancy [morlock.nancy@epa.gov]; Garcia, Beth [garcia.beth@epa.gov]; Deabay, Elizabeth [Deabay.Beth@epa.gov]; McClintock, Katie [McClintock.Katie@epa.gov]; Nam, Ed [nam.ed@epa.gov]; Ambrosino, Helene [Ambrosino.Helene@epa.gov]; Teter, Royan [Teter.Royan@epa.gov]; Sullivan, Greg [Sullivan.Greg@epa.gov]; Conetta, Benny [Conetta.Benny@epa.gov]; Vance, Ronald [Vance.Ronald@epa.gov]; Villamizar, Nicole [Villamizar.Nicole@epa.gov]; Wainberg, Daniel [Wainberg.Daniel@epa.gov]; Wait, Monica [Wait.Monica@epa.gov]; Fischer, David [Fischer.David@epa.gov]; Miles, James [miles.james@epa.gov]; Nguyen, Khanh [Nguyen.Khanh@epa.gov]; Kochis, Daniel [Kochis.daniel@epa.gov]; Garcia, Beth [garcia.beth@epa.gov]; Segall, Martha [Segall.Martha@epa.gov]
CC: Ricks-Sinquefield, Debra [Ricks-Sinquefield.Debra@epa.gov]
Subject: August 2019 OCSPP RDD Meeting: Materials for Session 2 - OPP 101 and Updates
Attachments: Session 2 OPP 101 Aug 2019 RDD Mtg 8-8-19 RPK SO.pptx; Session 2 Regional Priorities Issue Paper Aug 2019 v2.docx; Session 2 Emerging Issues RDD Aug 2019 8-13-19 RPK SO .docx

Please note- anyone participating by conference line on the first day of the meeting (August 14)– the phone lines will open at 2:30 pm

Please find attached the following materials for the August 2019 OCSPP RDD Meeting: **Session 2 OPP 101 and Updates:**

Session 2 documents:

- a. Session 2 OPP 101 Aug 2019 RDD Mtg 8-8-19 RPK SO ppt
- b. Session 2 Regional Priorities Issue Paper Aug 2019 v2

c. Session 2 Emerging Issues paper

Here are additional details about the meeting:

August OCSPP RDD Meeting

Dates: August 14-15, 2019

Meeting Location: EPA Headquarters, Potomac Yard Building, Room S1204/06

Remote Access: Conference line **Ex. 6 Personal Privacy (PP)**

Agenda and Session Materials: Draft agenda, list of attendees and session materials can be found [here](#) on SharePoint. As this will be a paperless meeting, please bring your own printed copies of any materials you would like to have available on paper.

Conference Code: **Ex. 6 Personal Privacy (PP)**

Thanks,
Tara Glynn
US EPA Region 2
(732) 906-6183

Message

From: Hanley, Mary [Hanley.Mary@epa.gov]
Sent: 2/21/2019 8:51:58 AM
To: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]
Subject: GlobalChem
Attachments: Dunn BNA Webinar Talking Points.V9.docx

Hi Charlotte and Erik,

[Note that I had started to draft this last night **Ex. 6 Personal Privacy (PP)**
Ex. 6 Personal Privacy (PP) but didn't want this to linger as we are running out of time. **Ex. 6 Personal Privacy (PP)**
Ex. 6 Personal Privacy (PP)

Charlotte, you got our gears rolling on all of the GlobalChem presentations with an emphasis on trying to not have repetition while ensuring consistency - from Alex's keynote, followed by Jeff's presentation, followed now by your panel, and later in the day by Erik's panel.

It may be helpful to have **a discussion this week with each of you, et. al, as well as Jeff and/or Alison since there is a lot of work to be done in a very short period of time to get all 4 presentations lined up. Does it make sense to also set time early next week with Alex to talk about what she wants in her keynote beyond her BNA talking points?** Her keynote is 45 minutes which her BNA talkers do not get us to.

Charlotte, you had asked James, Sonia and I to come up with an outline of all the presentations as you considered your panel participation. As we did that, Alex's priorities and her TSCA points have further evolved and, as I understand it your approach to your panel will be forward looking to the 2022 goals in the Strategic Plan, etc.

Attached are Alex's BNA points as well as a skimpy outline of what Jeff and each of you will discuss. I have asked OPPT for points for both of your presentations early next but **we will need more clarification on exactly what is needed (including is it points or a slide presentation and for how long are you speaking?).** I have also asked for Alex's points but beyond what is in the attached I think we need to (an appropriately so) either give more guidance or make that happen at our level. Alison is just getting back to the office. I have asked her for any previous keynote addresses done under new TSCA.

M

Message

From: Hanley, Mary [Hanley.Mary@epa.gov]
Sent: 2/15/2019 6:38:36 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]
CC: Altieri, Sonia [Altieri.Sonia@epa.gov]
Subject: Revision RE: For Your Review: Draft BNA Talking Points
Attachments: Draft. Dunn BNA Webinar Talking Points.V3 REDLINE docx.docx

Nancy can you take a quick look at this redline which reflects inputs from Sonia and Amanda before I put it in Alex's binder. Thanks.

From: Beck, Nancy
Sent: Friday, February 15, 2019 10:33 AM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Baptist, Erik <baptist.erik@epa.gov>
Cc: Hanley, Mary <Hanley.Mary@epa.gov>; Altieri, Sonia <Altieri.Sonia@epa.gov>
Subject: RE: For Your Review: Draft BNA Talking Points

Thanks for this. It's a great summary.
My only correction is that on page 2, its about 250 people working on TSCA, not 300.

I think this is way too much detail for 20 minutes. We should have Alex take a hard look at this so she can decide what she wants the focus to be on. If she wants to focus mostly on TSCA, then much of the details about the individual pesticides should come out and then vice versa if she wants to focus on FIFRA. I think for this audience more time on TSCA is better and then less on FIFRA (perhaps just focus on the items that are in the bulleted slides—ESA and biotech as priorities and note other key pesticide activities but don't go into detail, but she should really decide what she wants. Also the pesticides is a mix of background and TPs—again an area that could be cut for this talk—but super helpful for other venues..

Many thanks!

Nancy B. Beck, Ph.D., DABT
Principal Deputy Assistant Administrator, OCSPP
P: 202-564-1273
beck.nancy@epa.gov

From: Keller, Kaitlin
Sent: Thursday, February 14, 2019 6:41 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>; Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Baptist, Erik <baptist.erik@epa.gov>
Cc: Hanley, Mary <Hanley.Mary@epa.gov>; Altieri, Sonia <Altieri.Sonia@epa.gov>
Subject: For Your Review: Draft BNA Talking Points

Attached is a first cut of Alex's talking points for BNA, as well as the slides. The last slide (FIFRA 19 Priorities) needs some work but I am holding off until we have comments on the talking points. Note that there are a few brief placeholders for updates still, but it's as ready for review as we could get it today. I believe her time will be ~20 minutes, plus Q&A. We started with an extensive set but can cut down as needed.

Please let us know your comments.

Thanks,
Kaitlin

Kaitlin Keller, Special Assistant
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-7098

Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 2/14/2019 11:41:10 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]
CC: Hanley, Mary [Hanley.Mary@epa.gov]; Altieri, Sonia [Altieri.Sonia@epa.gov]
Subject: For Your Review: Draft BNA Talking Points
Attachments: Draft. AA BNA Webinar Slides.V1.pptx; Draft. Dunn BNA Webinar Talking Points.V2 docx.docx

Attached is a first cut of Alex's talking points for BNA, as well as the slides. The last slide (FIFRA 19 Priorities) needs some work but I am holding off until we have comments on the talking points. Note that there are a few brief placeholders for updates still, but it's as ready for review as we could get it today. I believe her time will be ~20 minutes, plus Q&A. We started with an extensive set but can cut down as needed.

Please let us know your comments.

Thanks,
Kaitlin

Kaitlin Keller, Special Assistant
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-7098

Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 2/8/2019 6:33:05 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]
CC: Dunn, Alexandra [dunn.alexandra@epa.gov]
Subject: FW: Alternatives to Animal Testing Slides
Attachments: 2019-21st Century Toxicology Update_OCSPP AA briefing.pptx

As discussed in the OPP General last week. Attached is a draft comprehensive overview of OCSPP's work on alternatives for your review. Note that an IO briefing hasn't yet been scheduled, but the slides were sent in advance to review as this is towards the top of the list of future OCSPP briefings for the Acting Administrator. Please let me know your questions/comments.

Thanks,
Kaitlin

From: Dinkins, Darlene
Sent: Friday, February 08, 2019 1:24 PM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>
Cc: Lowit, Anna <Lowit.Anna@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>
Subject: Alternatives to Animal Testing Slides

Kaitlin,

Please find attached Anna's slides on Alternatives to Animal Testing.

Darlene Dinkins
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 305-5214

Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 10/22/2018 9:15:48 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]
Subject: For IO Clearance: PBPK Modeling Paper (Cecilia Tan)
Attachments: PBPK tiered paper draft_10112018 rev.docx

Attached please find Cecilia Tan's paper on PBPK modeling for IO review. The paper summarizes some of the work she and Jeremy Leonard (her post-doc when she was in ORD) had done in the last four years. They plan to submit to a special issue on PBPK modeling in the journal Computational Toxicology. Please let me know if you have any questions/comments.

Thanks,
Kaitlin

Kaitlin Keller, Special Assistant
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-7098

Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 9/17/2018 8:23:00 PM
To: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]; Beck, Nancy [Beck.Nancy@epa.gov]
Subject: FW: For IO Clearance: Kable Davis and Nancy Fitz Presentation for the IR-4 Food Use Workshop - September 19
Attachments: 2018 Food Use Workshop Presentation 9 17 18.pptx

Please see attached slides for an IR-4 food use workshop this Weds. Per the note below, slides 4, 8, 9, 10, 11, and 14, were taken directly from a recently cleared presentation. (There's 16 slides, including intro/closing slides.)

Thanks,
Kaitlin

From: Dinkins, Darlene
Sent: Monday, September 17, 2018 4:11 PM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>
Cc: McKamey, Ann <McKamey.Ann@epa.gov>
Subject: For IO Clearance: Kable Davis and Nancy Fitz Presentation for the IR-4 Food Use Workshop - September 19

Kaitlin,

We would appreciate your assistance in helping get the attached slides for Kable Davis and Nancy Fitz cleared in time for their presentation for the IR-4 Food Use Workshop on Wednesday, September 19, in St. Louis, MO. Unfortunately, there was an oversight with comments/edits sent from the IO that delayed the revised presentation. The topics included in the presentation were specifically requested by IR-4. Please note that slides 4, 8, 9, 10, 11, and 14, were taken directly from Mike Goodis' recently cleared NASDA presentation. Bo and Nancy are scheduled to leave tomorrow for MO. We're hoping for a miracle in requesting an expedited review ☺. Thanks!

Darlene Dinkins
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 305-5214

From: Keigwin, Richard
Sent: Monday, September 17, 2018 3:11 PM
To: Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Subject: RE: Slides for Clearance

Thanks. This can move forward to the OCSP-IO for review/clearance.

Message

From: Hamernik, Karen [Hamernik.Karen@epa.gov]
Sent: 8/8/2018 3:53:42 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]
CC: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Hanley, Mary [Hanley.Mary@epa.gov]; Barone, Stan [Barone.Stan@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]
Subject: RE: ORD comments: STPC Guidelines for Human Exposure Assessment
Attachments: RAF_Guidelines for Human Exposure Assessment STPC_ORDcomments_Aug62018_v2.docx

Nancy,

- Am passing on comments from ORD on the draft Human Exposure Assessment guidelines.
- Am not sure what the coordination is on this or working with OSA (etc.) to address comments in general.
- Most of ORD's comments involve the tribal section and OCSPP had a lot of comments on that section as well.

Thanks,
Karen

From: Flowers, Lynn
Sent: Wednesday, August 08, 2018 11:39 AM
To: Hamernik, Karen <Hamernik.Karen@epa.gov>
Subject: ORD comments: STPC Guidelines for Human Exposure Assessment

Just sharing. Most comments on in the tribal section.

From: Flowers, Lynn
Sent: Monday, August 06, 2018 4:49 PM
To: Science and Technology Policy Council Staff <STPC_Staff@epa.gov>
Cc: Fleming, Megan <Fleming.Megan@epa.gov>; Rodan, Bruce <rodan.bruce@epa.gov>; Hauchman, Fred <hauchman.fred@epa.gov>; Deener, Kathleen <Deener.Kathleen@epa.gov>; Rodia, Monica <Rodia.Monica@epa.gov>
Subject: ORD comments: STPC Guidelines for Human Exposure Assessment

Hi all:

Thanks for the additional extension to August 6.

ORD concurs with comment (please pay particular attention to comments on consideration of tribal populations).

Please find comments in the attached draft document.

Thanks! Please let me know if you have any questions.

Lynn

Lynn Flowers, PhD, DABT
Associate Director for Science
Office of Science Policy/ORD
US EPA
Washington, DC
202-564-6293

Message

From: Hanley, Mary [Hanley.Mary@epa.gov]
Sent: 8/20/2018 12:17:55 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]
CC: Keller, Kaitlin [keller.kaitlin@epa.gov]
Subject: FW: For IO Clearance: Rick Keigwin's Presentation for ASPCRO Meeting - August 23
Attachments: Keigwin ASPCRO August 2018 Structural Fumigation.pptx

Nancy,

Below, Rick answers your questions re: slides 13 & 15. Let us know if you need anything further.

M

From: Keigwin, Richard
Sent: Monday, August 20, 2018 8:13 AM
To: Hanley, Mary <Hanley.Mary@epa.gov>
Cc: Keller, Kaitlin <keller.kaitlin@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>
Subject: RE: For IO Clearance: Rick Keigwin's Presentation for ASPCRO Meeting - August 23

Mary—

I've revised the presentation to address Nancy's comments.

Slide 9, first bullet: deleted, per Nancy's suggestion

Slide 9, third bullet: revised, per Nancy's edit

Slide 13: turns out that there were two SF incidents in FL; revised accordingly

Ex. 5 Deliberative Process (DP)

From: Hanley, Mary
Sent: Thursday, August 16, 2018 6:29 PM
To: Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>
Cc: Keigwin, Richard <Keigwin.Richard@epa.gov>
Subject: Fwd: For IO Clearance: Rick Keigwin's Presentation for ASPCRO Meeting - August 23

Please see Nancy's comments below.

Sent from my iPhone

Begin forwarded message:

From: "Beck, Nancy" <Beck.Nancy@epa.gov>
Date: August 16, 2018 at 6:27:32 PM EDT
To: "Keller, Kaitlin" <keller.kaitlin@epa.gov>, "Bertrand, Charlotte" <Bertrand.Charlotte@epa.gov>, "Baptist, Erik" <Baptist.Erik@epa.gov>
Cc: "Hanley, Mary" <Hanley.Mary@epa.gov>
Subject: RE: For IO Clearance: Rick Keigwin's Presentation for ASPCRO Meeting - August 23

Slide 9- I think you can delete the first bullet, as slides note the 2 year registration earlier in the slide deck; will free up more space on the slide

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Thanks!
Nancy

Nancy B. Beck, Ph.D., DABT
Deputy Assistant Administrator, OCSPP
P: 202-564-1273
M: 202-731-9910
beck.nancy@epa.gov

From: Keller, Kaitlin
Sent: Wednesday, August 15, 2018 12:44 PM
To: Bertrand, Charlotte <Bertrand.Charlotte@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Baptist, Erik <Baptist.Erik@epa.gov>
Subject: FW: For IO Clearance: Rick Keigwin's Presentation for ASPCRO Meeting - August 23

See Rick's 2nd ASPCRO presentation attached, per Darlene's note, many have been previously reviewed but updated.

Side Note: ASPCRO = Association of Structural Pest Control Regulatory Officials

Kaitlin Keller, Special Assistant
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-7098

From: Dinkins, Darlene
Sent: Wednesday, August 15, 2018 12:41 PM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: For IO Clearance: Rick Keigwin's Presentation for ASPCRO Meeting - August 23

Kaitlin,

Please find attached Rick's presentation for the ASPCRO conference next Thursday. He plans to present remotely. Most of the slides were used from his presentation at the National Landscape Professionals meeting in July, with updates, including:

- Added Slide #17 on Pyrethroids Reg Review
- Added Slides on structural fumigation
- Updates to Slides # - the reg review numbers

Darlene Dinkins

Office of Pesticide Programs

U.S. Environmental Protection Agency

(703) 305-5214

Message

From: Perrin, Rebecca [Perrin.Rebecca@epa.gov]
Sent: 8/7/2019 1:07:04 AM
To: Perrin, Rebecca [Perrin.Rebecca@epa.gov]
Subject: Ag Update 104

Hello all,

This update includes the following information:

1. Call for Applications: Trump Administration to support community revitalization, local food initiatives
2. EPA awards South Dakota Department of Environment and Natural Resources over \$2.5 million
3. EPA awards Wyoming Department of Environmental Quality \$859,000 grant to protect water quality
4. Newly Available Data to be Incorporated into Pyrethroid Proposed Interim Decisions
5. Federal Officials Announce Priority Actions Supporting Long-Term Drought Resilience.
6. EPA and the American Conservation Corps sign a MOU.
7. EPA and White House CEQ Honor over 200 U.S. Teachers and Students at Presidential Environmental Youth Awards Ceremony

Have a great rest of your week.

Rebecca Perrin

Region 8 Agriculture Advisor | Office of the Regional Administrator | USEPA

1595 Wynkoop Street (8ORA-IO) | Denver CO 80202 | DL: 303-312-6311 | FAX: 303-312-6882

1. Call for Applications: Trump Administration to support community revitalization, local food initiatives.

On August 6, 2019, in support of the Trump Administration's Executive Order on Promoting Agriculture and Rural Prosperity in America, the U.S. Environmental Protection Agency (EPA) announced an opportunity to apply for technical assistance for communities interested in revitalizing neighborhoods through development of local food systems. The assistance will be provided through the Local Foods, Local Places (LFLP) program. Local Foods, Local Places supports projects that: (1) Create livable, walkable, economically vibrant main streets and mixed-use neighborhoods; (2) Boost economic opportunities for local farmers and main street businesses; (3) Improve access to healthy, local food, especially among disadvantaged populations; and (4) LFLP partner communities work with a team of agricultural, environmental, public health and regional economic development experts to set goals and identify local assets that can support the local food economy. The deadline for applications is September 30, 2019.

- For more information see: <https://www.epa.gov/newsreleases/call-applications-trump-administration-support-community-revitalization-local-food-1>
 - To apply for LFLP assistance: <https://www.epa.gov/smartgrowth/local-foods-local-places-2019-2020-application>
 - To see a list and map of designated Opportunity Zones: <https://www.cdfifund.gov/Pages/Opportunity-Zones.aspx>.
-

2. EPA awards South Dakota Department of Environment and Natural Resources over \$2.5 million to improve water quality and watershed health throughout the state. The EPA has awarded \$2,574,000 to the South Dakota Department of Environment and Natural Resources (SD DENR) to improve water quality in streams, rivers and lakes through a Nonpoint Source Program Clean Water Act (Section 319) grant. This grant is given to states to implement environmental programs that address various sources of pollution in surface and groundwater in order to meet and maintain water quality standards. This grant continues extensive work in all watersheds throughout the state including the Big Sioux, James, Belle Fourche, Missouri, Minnesota, and Vermillion to reduce nonpoint source pollution and improve water quality. Agriculture is the predominant land use in all these watersheds and is the leading source of nonpoint source pollution, also known as runoff. The nonpoint source grant provides seed money that is matched by state and local funding, as well as other federal monies, bringing together local landowners and a variety of government agencies, all working towards a common goal of improved water quality. The effects of nonpoint source pollution can be seen within the lakes, streams, and rivers of South Dakota. In general, the nonpoint source pollutants causing the majority of South Dakota's surface water quality impairments are pathogens and sediment. Projects funded include an information and education component, water quality monitoring, and installation of best management practices (BMPs) designed to reduce nonpoint source pollution. BMPs may include activities such as installing riparian buffer strips to filter water before it reaches the lake or stream, installing fencing and providing alternative sources of water to keep livestock out of waterbodies, replacement of flood irrigation systems with high-efficiency sprinkler irrigation systems, and bank stability activities that reduce erosion, as well as other activities designed to directly reduce nonpoint source pollution. Each project has a local coordinator who works with various partner agencies to achieve project goals and develop local support and funds to bolster the project.

For more information regarding EPA's Nonpoint Source grant program visit: <https://www.epa.gov/nps/319-grant-program-states-and-territories>

3. EPA awards Wyoming Department of Environmental Quality \$859,000 grant to protect water quality. On July 24, 2019, The EPA has awarded \$859,000 to the Wyoming Department of Environmental Quality (WDEQ) to help protect human health and the environment through a Nonpoint Source Program (NPS) Clean Water Act Section 319 grant. This grant is given to states to implement environmental programs that address nonpoint source pollution in surface and ground water to meet and maintain water quality standards. Under this program, a total of eight proposals were selected for funding that will include watershed planning and implementation projects; stream restoration and livestock impact practices; sediment reduction and monitoring; aquatic habitat improvements; and information and education projects. The program works through a set of overarching principles that emphasize voluntary and incentive-based participation, locally-led projects, partnerships, measurable water quality improvement, and effective and efficient program administration. For more information, on Wyoming's NPS accomplishments for 2018 visit: <https://arccg.is/18SG5S>. The effects of nonpoint source pollution can be seen within the lakes, streams and rivers of Wyoming. The three nonpoint source pollutants causing the majority of Wyoming's surface water quality impairments are pathogens, sediment and selenium. You can learn more about successful nonpoint source projects at <https://www.epa.gov/nps/nonpoint-source-success-stories>

4. Newly Available Data to be Incorporated into Pyrethroid Proposed Interim Decisions. Based on a thorough review of recent data, EPA concluded that there are reliable data to support reducing the current threefold (3X) Food Quality Protection Act (FQPA) [safety factor for pyrethroids](#) to 1X, and that margin will be safe for infants and children. This reduced safety factor will be incorporated into the upcoming pyrethroid proposed interim decisions for registration review. EPA is required to apply a 10X margin of safety, or safety factor, to human health risk assessments to account for potential prenatal and postnatal toxicity of infants, children and pregnant women when exposed to pesticides. The law allows a different margin of safety only if the Agency has reliable data supporting a conclusion that the revised safety factor would protect infants and children. The Agency considers the FQPA safety factor to have two components: one assigned to pharmacokinetic (PK) differences and another for pharmacodynamic (PD) differences. The PK component refers to the process of chemicals being absorbed, distributed, metabolized and excreted from and in the body. The PD component refers to how a chemical affects the body's tissue. EPA will be accepting comments on the white paper once

the Federal Register notice announcing availability of the pyrethroid Proposed Interim Registration Review Decisions is published later this year. Once the Proposed Interim Decisions are published, comments should be submitted to www.regulations.gov under docket # EPA-HQ-OPP-2008-0331.

For more details, read the [“Re-Evaluation of the FQPA Safety Factor for Pyrethroids”](#).

5. Federal Officials Announce Priority Actions Supporting Long-Term Drought Resilience. On July 31, 2019, senior administration officials participated in the Second National Drought Forum where they announced Priority Actions Supporting Long-Term Drought Resilience. This document outlines key ways in which federal agencies support state, tribal and local efforts to protect the security of our food supply, the integrity of critical infrastructure, the resilience of our economy, and the health and safety of our people and ecosystems. The document was developed by the National Drought Resilience Partnership (NDRP), a federal collaborative formed to promote long-term drought resilience nationwide. While authority lies with the states to manage water resources, federal agencies play a key role in supporting states, tribes, communities, agriculture, industry, and the private sector owners and operators of critical national infrastructure to prepare for, mitigate against, respond to, and recover from drought. The NDRP and the document released today focus on fostering a national dialogue about how federal agencies can support these entities in building a more drought-resilient nation for sufficient water quality and quantity and a vibrant economy at the local level. NDRP categorizes its drought resilience efforts along six goal areas, which provide a framework to systematically address how the federal government supports building long-term drought resilience.

- Learn more here: <https://www.epa.gov/newsreleases/federal-officials-announce-priority-actions-supporting-long-term-drought-resilience>
-

6. EPA and the American Conservation Corps sign a MOU. On July 24, 2019, EPA Administrator Andrew Wheeler signed a first-time Memorandum of Understanding (MOU) with the American Conservation Coalition (ACC) to attract, educate, inspire and prepare students for careers and opportunities within today's various environmental fields. ACC can help and attend at many EPA events including Trash Free Waters, Winning on Reducing Food Waste Initiative, Healthy Schools Initiative, and America Recycles Day. EPA looks forward to continuing the relationship with ACC and its members on over 130 college campuses.

- For additional information, please see the associated [press release](#).
 - Read the MOU [here](#).
 - For additional pictures, please see the [MOU American Conservation Coalition photo gallery](#) on EPA's Office of Multimedia site. (note: optimal viewing via Intranet Edge or Firefox browsers).
-

7. EPA and White House CEQ Honor over 200 U.S. Teachers and Students at Presidential Environmental Youth Awards Ceremony. On July 25, 2019, EPA Administrator Andrew Wheeler and White House Council of Environmental Quality (CEQ) Chairman Mary Neumayr announced the 2019 awardees of the Presidential Innovation Award for Environmental Educators (PIAEE) and the President's Environmental Youth Award (PEYA) during an awards ceremony at the Ronald Reagan Building and International Trade Center in Washington, D.C. From across the country, 19 educators and 200 students were recognized for their remarkable efforts that promote environmental education and stewardship. Eleven educators received the Presidential Innovation Award for Environmental Educators, and eight educators were recognized with an honorable mention distinction. Additionally, the 200 student award recipients - who worked as a team or individually on 17 projects - received the President's Environmental Youth Award. Altogether, EPA received 162 project applications from 26 states.

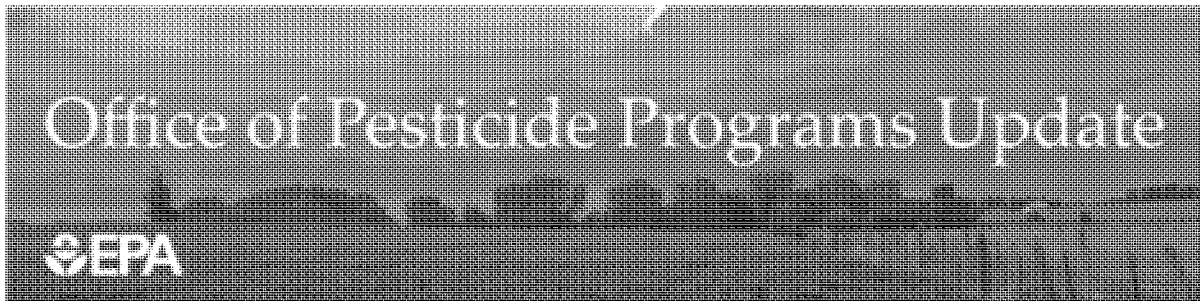
Established by the 1990 National Environmental Education Act, the PEYA program promotes local environmental awareness among our nation's youth and encourages positive community involvement. EPA Headquarters works with staff located in EPA's 10 regional offices in the selection of award recipients across the country.

- **PEYA Winners in Region 8:**
 - **Award Category: Grade K-5:** Green Team Superheroes: Team Members: Aiden, Brady, Henry, Jackson, Alyssa, Madison, Annikah, Reagan, Samuel, Campbell, Julianne, Dillon, Genevieve - Colorado
 - **Award Category: Grade 6-12:** Development of a Novel Tool for Monitoring Soil Health and Contamination by Kylan – Colorado
- Learn more about PEYA awardees and their projects at: <https://www.epa.gov/education/presidents-environmental-youth-award-peya-winners>

Also established by the 1990 National Environmental Education Act, PIAEE supports, encourages and nationally honors outstanding kindergarten through high school educators who integrate environmental and place-based, experiential learning into school curricula and school facility management across the country. Under the act, the White House CEQ assists EPA in administering the awards program.

- **PIAEE Winner in Region 8:** Amy R. Williams at Polson Middle School in Polson, Montana
- **PIAEE honorable mention recipient in Region 8:** Caitlin Webb at Dixon School in Dixon, Montana
- Learn more about the PIAEE awardees and their projects at: <https://www.epa.gov/education/presidential-innovation-award-environmental-educators-piaee-winners>

From: EPA Pesticides Programs [oppt.epa@public.govdelivery.com]
Sent: 8/2/2019 4:07:11 PM
To: Beck, Nancy [Beck.Nancy@epa.gov]
Subject: Pesticide Program Update: Newly Available Data to be Incorporated into Pyrethroid Proposed Interim Decisions



Newly Available Data to be Incorporated into Pyrethroid Proposed Interim Decisions

Based on a thorough review of recent data, EPA concluded that there are reliable data to support reducing the current threefold (3X) Food Quality Protection Act (FQPA) safety factor for pyrethroids to 1X, and that margin will be safe for infants and children. This reduced safety factor will be incorporated into the upcoming pyrethroid proposed interim decisions for registration review.

EPA is required to apply a 10X margin of safety, or safety factor, to human health risk assessments to account for potential prenatal and postnatal toxicity of infants, children and pregnant women when exposed to pesticides. The law allows a different margin of safety only if the Agency has reliable data supporting a conclusion that the revised safety factor would protect infants and children.

The Agency considers the FQPA safety factor to have two components: one assigned to pharmacokinetic (PK) differences and another for pharmacodynamic (PD) differences. The PK component refers to the process of chemicals being absorbed, distributed, metabolized and excreted from and in the body. The PD component refers to how a chemical affects the body's tissue.

In 2010, EPA reviewed the data relevant to assessing the health risks of pyrethroid exposure to infants and children and found that they supported the removal of the safety factor for PD. However, the data were insufficient to change the PK portion of the uncertainty factor, thus leaving a 3X safety factor

More recently, EPA has performed a new evaluation of available guideline and literature studies, as well as data generated by the Council for the Advancement of Pyrethroid Human Risk Assessment. The Agency concluded that the FQPA safety factor for pyrethroids should be reduced to 1X for all populations (1X for PD and 1X for PK) because the data indicate that there is no increased sensitivity, or in other words, there are no PK differences between adults and children.

Pyrethrins and pyrethroids are insecticides widely used in and around households, including on pets. They are also used in treated clothing, mosquito control, and agriculture.

We invite stakeholders to review the methodology and EPA's conclusion to lower the FQPA Safety factor. EPA will be accepting comments on the white paper once the Federal Register notice announcing availability of the pyrethroid Proposed Interim Registration Review Decisions is published later this year. Once the Proposed Interim Decisions are published, comments should be submitted to www.regulations.gov under docket # [EPA-HQ-OPP-2008-0331](https://www.regulations.gov/docket/EPA-HQ-OPP-2008-0331).

For more details, read the "[Re-Evaluation of the FQPA Safety Factor for Pyrethroids](#)".

EPA distributes its OPP Updates to external stakeholders and citizens who have expressed an interest in the Agency's pesticide program activities and decisions. This update service is part of EPA's continuing effort to improve public access to federal pesticide information.

For general questions about pesticides and pesticide poisoning prevention, contact the National Pesticide Information Center (NPIC) by email at npic@ace.orst.edu or by visiting the [NPIC website](#).

For information about ongoing activities in the Office of Pesticide Programs, [visit our homepage](#).



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This email was sent to beck.nancy@epa.gov using GovDelivery Communications Cloud on behalf of: U.S. EPA Office of Chemical Safety and Pollution Prevention · 707 17th St, Suite 4000 · Denver, CO 80202 · 1-800-439-1420



Message

From: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]
Sent: 8/6/2018 10:02:58 PM
To: Hamernik, Karen [Hamernik.Karen@epa.gov]
CC: Beck, Nancy [Beck.Nancy@epa.gov]
Subject: DRAFT Collated OCSPP Comments_Guidelines for Human Exposure Assessment STPC Concurrence_072618.docx
Attachments: DRAFT Collated OCSPP Comments_Guidelines for Human Exposure Assessment STPC Concurrence_072618.docx

Karen – thank you for coordinating the collection of the comments for OCSPP! Thank you too for waiting for my comments. I have added a few extra thoughts into the document. Let me know if you have any questions. Charlotte

Appointment

From: Dunn, Alexandra [dunn.alexandra@epa.gov]
Sent: 6/18/2019 1:51:28 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]; Wilbur, Donald [Wilbur.Donald@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Anderson, Brian [Anderson.Brian@epa.gov]; Nesci, Kimberly [Nesci.Kimberly@epa.gov]; Anderson, Neil [Anderson.Neil@epa.gov]; Britton, Cathryn [Britton.Cathryn@epa.gov]; Sherman, Kelly [Sherman.Kelly@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]; Nguyen, Khue [Nguyen.Khue@epa.gov]; Appleyard, Moana [Appleyard.Moana@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]; Mannix, Marianne [Mannix.Marianne@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; White, Katrina [White.Katrina@epa.gov]; Thurman, Nelson [Thurman.Nelson@epa.gov]; Judkins, Donna [Judkins.Donna@epa.gov]; Wente, Stephen [Wente.Stephen@epa.gov]; Housenger, Justin [Housenger.Justin@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Kiely, Timothy [Kiely.Timothy@epa.gov]; Kaul, Monisha [Kaul.Monisha@epa.gov]; DCRoomEast3156/DC-EPA-EAST-OCSP [DCRoomEast3156@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]
CC: Berwald, Derek [Berwald.Derek@epa.gov]; Cook, Colwell [cook.colwell@epa.gov]; St. Fleur, Marilyn [StFleur.Marilyn@epa.gov]; Bennett, Isabella [Bennett.Isabella@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Myers, Tom [Myers.Tom@epa.gov]; Biscoe, Melanie [Biscoe.Melanie@epa.gov]; Blankinship, Amy [Blankinship.Amy@epa.gov]; Arnold, Elyssa [Arnold.Elyssa@epa.gov]

Subject: Pyrethroids Registration Review

Attachments: AA Briefing_Pyrethroids Registration Review Overview and Path Forward 6_19_19_clean.pptx

Location:

Ex. 6 Personal Privacy (PP)

Start: 6/24/2019 7:00:00 PM

End: 6/24/2019 7:45:00 PM

Show Time As: Tentative

To present the pyrethroids registration review overview, status, and path forward to include human health risk management approach



AA

Briefing_Pyrethro...

and proposed ecological mitigation

Message

From: Hanley, Mary [Hanley.Mary@epa.gov]
Sent: 6/28/2019 5:27:07 PM
To: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]
Subject: FW: RE: Revised Human Assessment Guidelines
Attachments: draft comment summary table_0619_re draft revised HEA guidelines EAG.docx; OCSPP original and new comments_as of 0619_on revised EAGL Final 5 30 19_ (002).docx

Hi. These are the materials for Monday's meeting. They are being printed for your folder.
M

From: Hamernik, Karen
Sent: Friday, June 28, 2019 1:20 PM
To: Hanley, Mary <Hanley.Mary@epa.gov>
Cc: Hughes, Hayley <hughes.hayley@epa.gov>
Subject: RE: RE: Revised Human Assessment Guidelines

Mary,

- We wanted to make sure that Charlotte has the materials for IO review that were supplied to Tom Sinks and the RAF/technical panel team in preparation for the meeting on the draft Revised Human Assessment Guidelines scheduled for Monday July 1st at 2:00 pm.
- Attached are:
 1. **A Comment Summary Table** (referencing the attached revised document) with comment page numbers and status.
 2. **The revised draft of the HEA Guidelines (with comments integrated)**
 - OCSPP/IO comments on the original document are highlighted in yellow
 - the RAF/technical team responses to those comments are highlighted in red-brown
 - The questions is: have those comments been acceptability addressed for concurrence?
 - New OPPT comments on the revised document are highlighted in pink
 - These include several ShowStoppers which the RAF/technical team has been requested to include in the document prior to any release;

Show-Stoppers:

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Please let us know if there are any questions.

Thanks,
Karen

-----Original Appointment-----

From: Hughes, Hayley

Sent: Thursday, June 27, 2019 11:22 AM

To: Hughes, Hayley; Sinks, Tom; Hamernik, Karen; Bertrand, Charlotte

Cc: Ohanian, Edward; Fry, Meridith; Tulve, Nicole; Olsen, Marian; Broder, Michael; Bussard, David

Subject: RE: Revised Human Assessment Guidelines

When: Monday, July 01, 2019 2:00 PM-2:45 PM (UTC-05:00) Eastern Time (US & Canada).

Where: DCRoomEast4128Polycom/DC-EPA-EAST-OCSP-OSCP Call-in# +1 (202) 991-0477 Conf. ID# 892154#

Message

From: Hamernik, Karen [Hamernik.Karen@epa.gov]
Sent: 7/23/2019 12:00:39 AM
To: Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Hughes, Hayley [hughes.hayley@epa.gov]; Fehrenbacher, Cathy [Fehrenbacher.Cathy@epa.gov]
CC: Lowit, Anna [Lowit.Anna@epa.gov]; Hanley, Mary [Hanley.Mary@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]
Subject: RE: Latest Markup for Review: Revised Human Assessment Guidelines
Attachments: Guidelines for Human Exposure Assessment Draft Final 752019.docx; New Revisions 072219_Based on 070219 meeting_draft comment summary table_0619_re draft revised HEA guidelines EAG (004).docx

Importance: High

All,

- Following up to our joint meeting on July 2, the technical team has provided the document markup based on our discussions (attached).
- In looking thru the mark-up, I see some edits were not made exactly as I might have expected but they may be adequate. Therefore, please look thru the document and let me know if there are still showstoppers or areas where we need to get back to the technical team or whether the markup is adequate to addresses comments.
- To facilitate coordination and the due date that Jennifer has requested, please get back to me no later than Thursday COB, July 25th, 2019. If I can be of assistance, please let me know.
- I have also updated the Comment Status summary table (attached), as best I could. This will assist you in locating areas we discussed at the meeting but bear in mind that broader edits may have been made to accommodate revisions. There has been some shift in page numbering from the last version which I tried to indicate.

Thanks,
Karen

-----Original Appointment-----

From: Hughes, Hayley
Sent: Thursday, June 27, 2019 11:22 AM
To: Hughes, Hayley; Hamernik, Karen; Fehrenbacher, Cathy; Sinks, Tom; Bertrand, Charlotte
Cc: Bussard, David; Tolve, Nicolle; Fry, Meridith; Ohanian, Edward; Olsen, Marian; Broder, Michael
Subject: RE: Revised Human Assessment Guidelines
When: Tuesday, July 02, 2019 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: DCRoomEast4128Polycom/DC-EPA-EAST-OCSP-OSCP

Ex. 6 Personal Privacy (PP)

Appointment

From: Bolen, Derrick [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1FFC58B0468C4DECA51A8BAD735B7D95-BOLEN, DERR]
Sent: 11/19/2019 6:24:14 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Smith, Charles [Smith.Charles@epa.gov]; Elissa Reaves [Reaves.Elissa@epa.gov]; Vogel, Dana [vogel.dana@epa.gov]; Sherman, Kelly [Sherman.Kelly@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; Tan, Cecilia [Tan.Cecilia@epa.gov]; Anna Lowit [Lowit.Anna@epa.gov] [Lowit.Anna@epa.gov]; Craig, Evisabel [Craig.Evisabel@epa.gov]; Metzger, Michael [Metzger.Michael@epa.gov]; VanAlstine, Julie [VanAlstine.Julie@epa.gov]; Olinger, Christine [Olinger.Christine@epa.gov]; Myers, Tom [Myers.Tom@epa.gov]; Rickard, Kristin [Rickard.Kristin@epa.gov]; Perron, Monique [Perron.Monique@epa.gov]; Jakob, Avivah [Jakob.Avivah@epa.gov]; Smith, Carolyn [smith.carolyn@epa.gov]; Evans, Elizabeth [Evans.Elizabeth@epa.gov]; Bennett, Isabella [Bennett.Isabella@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Mosby, Jackie [Mosby.Jackie@epa.gov]; Darlene Dinkins [Dinkins.Darlene@epa.gov] [Dinkins.Darlene@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]; Mills, William T. [mills.williamt@epa.gov]
CC: Wilbur, Donald [Wilbur.Donald@epa.gov]; Dawson, Jeffrey [Dawson.Jeff@epa.gov]; Fischer, David [Fischer.David@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]
BCC: DCRoomEast3156/DC-EPA-EAST-OCSP [DCRoomEast3156@epa.gov]
Subject: Pyrethroids - PBPK Model Applicability
Attachments: Pyrethroid briefing for Alex Dunn-final for IO- dec 3 2019.pptx .pptx
Location: 3156 WJC EAST Ex. 6 Conference Call-In Number
Start: 12/3/2019 7:00:00 PM
End: 12/3/2019 8:00:00 PM
Show Time As: Busy

To brief the OCSP-IO on the applicability of pyrethroid PBPK data on the entire class of pyrethroids, which includes the FQPA safety factor decision that applies to all pyrethroids, as well as the newer determination that the PBPK model is only appropriate for determining toxicity Points of Departure for the pyrethroids on which the modeling was conducted, not applied across the entire class of pyrethroids.



Pyrethroid briefing
for Alex Dunn-fin...

From: Dennis, Allison [Dennis.Allison@epa.gov]
Sent: 8/5/2020 8:57:33 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]
CC: Grable, Melissa [Grable.Melissa@epa.gov]; Lieberman, Paige [Lieberman.Paige@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Giddings, Daniel [giddings.daniel@epa.gov]; Mills, Madeline [Mills.Madeline@epa.gov]; Bolen, Derrick [bolen.derrick@epa.gov]; Hughes, Hayley [hughes.hayley@epa.gov]; Rosen, Bailey [Rosen.Bailey@epa.gov]
Subject: For Alex/Review Review: Consumer Reports; Re: FQPA; DDL Today

Proposed responses for your review. Thank you! -Allison

1. **10-FOLD SAFETY FACTOR.** I'm wondering about how and when the EPA applies the additional 10-fold safety factor as outlined in FQPA to various pesticide tolerances. . First, why was the 10-fold safety factor first applied to pyrethroids, but then recently removed? How does the EPA decide to change the FQPA safety factor it's been applying to a pesticide? And why have you decided not to apply the FQPA safety factor to most of the non-organophosphate pesticides that it has reviewed in recent years? Also, is the FQPA 10-fold safety factor currently applied to chlorpyrifos?

Ex. 5 Deliberative Process (DP)

2. **ENDOCRINE DISRUPTION.** Given that the FQPA mandates that the EPA evaluate pesticides for their endocrine disrupting potential, what progress has the agency made on that front? Why has EPA completed a full evaluation of the endocrine disrupting potential of only 52 pesticides since 1996? And to what extent do tests for potential endocrine disruption factor into the standard guideline studies required for registration or re-registration of a pesticide active ingredient?

Ex. 5 Deliberative Process (DP)

3. **PROGRESS ON FQPA GOALS.** Overall, what progress has the EPA made in the last 24 years to enact the provisions of the FQPA? And what progress has the agency made in bringing its standards for safety evaluations of pesticides in line with the latest science on the potential human health effects of pesticides?

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

From: Labbe, Ken <Labbe.Ken@epa.gov>
Sent: Thursday, July 30, 2020 8:54 AM
To: Dennis, Allison <Dennis.Allison@epa.gov>; Lieberman, Paige <Lieberman.Paige@epa.gov>; OPP FEAD CSB <OPP_FEAD_CSB@epa.gov>
Subject: FW: query from Consumer Reports

Hi all,

Pls see inquiry below. Deadline is 8/4.

Thanks!

From: Catherine Roberts <catherine.roberts@consumer.org>
Sent: Thursday, July 30, 2020 8:00 AM
To: Press <Press@epa.gov>
Cc: Patricia Calvo <trisha.calvo@consumer.org>
Subject: query from Consumer Reports

Hello,

I'm a journalist with Consumer Reports and I'm working on a story for the October issue of the magazine about pesticides on fruits and vegetables based on our analysis of the USDA Pesticide Data Program results I'm hoping you can answer a few questions we have about how and when the EPA calculates its risk tolerances and the way the agency is executing against the mandates of the FQPA. My questions fall into three main areas.

1. **10-FOLD SAFETY FACTOR.** I'm wondering about how and when the EPA applies the additional 10-fold safety factor as outlined in FQPA to various pesticide tolerances. . First, why was the 10-fold safety factor first applied to pyrethroids, but then recently removed? How does the EPA decide to change the FQPA safety factor it's been applying to a pesticide? And why have you decided not to apply the FQPA safety factor to most of the non-organophosphate pesticides that it has reviewed in recent years? Also, is the FQPA 10-fold safety factor currently applied to chlorpyrifos?
2. **ENDOCRINE DISRUPTION.** Given that the FQPA mandates that the EPA evaluate pesticides for their endocrine disrupting potential, what progress has the agency made on that front? Why has EPA completed a full evaluation of the endocrine disrupting potential of only 52 pesticides since 1996? And to what extent do tests for potential endocrine disruption factor into the standard guideline studies required for registration or re-registration of a pesticide active ingredient?
3. **PROGRESS ON FQPA GOALS.** Overall, what progress has the EPA made in the last 24 years to enact the provisions of the FQPA? And what progress has the agency made in bringing its standards for safety evaluations of pesticides in line with the latest science on the potential human health effects of pesticides?

Thank you for your help. I would appreciate a response by Tuesday, August 4.

Best,
Catherine Roberts

--

Catherine Roberts

Consumer Reports
Associate Editor, Health
918-361-7115 (m)

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Message

From: Dennis, Allison [Dennis.Allison@epa.gov]
Sent: 11/20/2020 6:40:00 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]
Subject: FW: For Alex Review: OCSPP Edits to OCHP Report for Dec. CHPAC Mtg; DDL: Tues COB
Attachments: CHPAC update_FINAL_July 2020.pdf; 2020.11.3 draft CHPAC report for OPP review RPKAD.docx; draft CHPAC report for OPPT review_oppt.docx

RE-upping this one. It's past due to OCHP.

From: Dennis, Allison
Sent: Monday, November 16, 2020 3:42 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>
Cc: Dekleva, Lynn <dekleva.lynn@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Mills, Madeline <Mills.Madeline@epa.gov>; Rosen, Bailey <Rosen.Bailey@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>; Richmond, Jonah <Richmond.Jonah@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>
Subject: For Alex Review: OCSPP Edits to OCHP Report for Dec. CHPAC Mtg; DDL: Tues COB

Alex,

As raised during last week's comms weekly, EPA's Office of Childrens Health Protection (OCHP) is preparing for its Children's Health Protection Advisory Committee meeting on December 9 and 11. Before each meeting, they prepare a report for the committee members to keep them informed on EPA actions that are relevant for children's health that have occurred since the last CHPAC meeting (see their last report attached).

OCHP shared with OPPT and OPP draft Word docs that would comprise of December committee reports for review and approval. As Ed noted during the comms weekly, while OCHP says these blurbs are largely drawn from language posted online, the OCHP staff sometimes make further edits to the language in a way that makes it inaccurate. Thus, you will see OPP and OPPT staff track changes to these documents which are now ready for your review and approval.

These documents now Rick, David, Lynn, and staff many edits. **I'd like to know if you like to make additional edits now or wait see the near final version.** Right now, this document is slated to go back to OCHP then OPA and Amanda Kasper (senior advisor to the administrator on children's health) for final approval. Thank you! -Allison

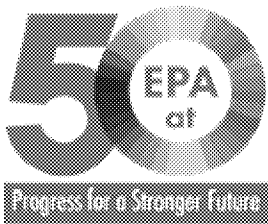
Allison Dennis
Communications Director
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
Office: (202) 564-1985 Cell: (202) 257-5629

Message

From: Tyler, Tom [Tyler.Tom@epa.gov]
Sent: 7/8/2020 6:38:27 PM
To: Lieberman, Paige [Lieberman.Paige@epa.gov]; Dunn, Alexandra [dunn.alexandra@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Fischer, David [Fischer.David@epa.gov]; Bolen, Derrick [bolen.derrick@epa.gov]
CC: Dennis, Allison [Dennis.Allison@epa.gov]; Hanley, Mary [Hanley.Mary@epa.gov]; Grable, Melissa [Grable.Melissa@epa.gov]; Malloy, Ruth [malloy.ruth@epa.gov]
Subject: RE: Children's Health Protection Report for Advisory Committee
Attachments: draft chpac report 07072020_.docx

+Mary
+Melissa
+Ruth

Tom Tyler, Chief of Staff
Office of Chemical Safety and Pollution Prevention
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW (MC 7101M), Washington, DC 20460
w202.566.0808 c202.770.6608 tyler.tom@epa.gov OCSPP/IO 3148A East



From: Lieberman, Paige <Lieberman.Paige@epa.gov>
Sent: Wednesday, July 8, 2020 2:15 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>
Cc: Dennis, Allison <Dennis.Allison@epa.gov>
Subject: FYI: Children's Health Protection Report for Advisory Committee

All –

I'm sharing the attached draft document for your awareness. OCHP has created it, highlighting EPA's various priorities, and plans to share it with their FACA later in the month.

There are a few OCSPP topics in here, including pesticides, TSCA and PFAS. Each sub-office is going to review their relevant sections by COB tomorrow. Let me know if you have any questions.

Best,
Paige

From: Hackel, Angela <Hackel.Angela@epa.gov>
Sent: Wednesday, July 08, 2020 8:52 AM
To: Lieberman, Paige <Lieberman.Paige@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>; DeLuca, Isabel <DeLuca.Isabel@epa.gov>; Millett, John <Millett.John@epa.gov>; Thomas, Latosha <Thomas.Latosha@epa.gov>; Colip, Matthew <colip.matthew@epa.gov>; Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Risley, David <Risley.David@epa.gov>

Cc: Grantham, Nancy <Grantham.Nancy@epa.gov>

Subject: Review Needed: Children's Health Protection Report for Advisory Committee

Hi everyone,

We are sending this around for a final review. I believe that some program office staff reviewed portions of this, although I do not believe that staff from all offices reviewed. This document will be shared with the Children's Health Protection Advisory Committee members in advance of July's meeting. If there is anything that should not be made public, please let me know.

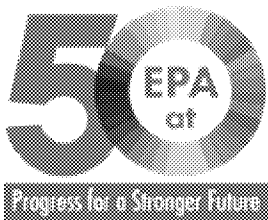
I would appreciate getting comments back by noon on Friday. We would like you to flag this for your senior management for their awareness.

If you have any questions, please let me know.

Thanks,

Angela

Angela Hackel
Senior Advisor
Office of the Administrator
Office of Public Affairs
U.S. Environmental Protection Agency
Washington, DC 20460
Office: 202.566.2977
Cell: 202.763.3945



Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 11/6/2019 10:54:40 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]
CC: Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Han, Kaythi [Han.Kaythi@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]
Subject: For your review: pyrethroids safety factor one pager
Attachments: Pyrethroids rvsd 11.6.2019.docx

Alex- as discussed, attached is a one pager on the pyrethroids FQPA safety factor for you review.

Per Kaythi, Nancy Grantham asked for some background on this and also asked about a one pager for the Administrator's awareness as well.

This pulls mostly from the list serve and follow up comms. Please let me know your comments/edits.

Thanks,
Kaitlin

Kaitlin Keller, Special Assistant
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-7098

Message

From: Bolen, Derrick [bolen.derrick@epa.gov]
Sent: 10/28/2019 3:56:24 PM
To: Dickerson, Aaron [dickerson.aaron@epa.gov]; Hyman, Alana [Hyman.Alana@epa.gov]; Scott, Corey [scott.corey@epa.gov]
CC: Dunn, Alexandra [dunn.alexandra@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]
Subject: Binder Material
Attachments: Follow-up Questions to Pesticide Registration Review.docx

Attached are follow-up answers to the questions raised during the October 16th "Upcoming Pesticides Decisions" briefing.

Thank you,
Derrick Bolen

Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 9/26/2019 6:36:48 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]; Fischer, David [Fischer.David@epa.gov]
CC: Tyler, Tom [Tyler.Tom@epa.gov]; Malloy, Ruth [malloy.ruth@epa.gov]
Subject: FW: FOR IO REVIEW: Summaries of Upcoming Registration Review Deliverables
Attachments: Mothballs Background for OCSPP IO.8-26-19.docx; Phostebupirim_DRA_factsheet_for_OCSPP_IO 08.28.19.docx; GnRH OnePager Docket Opening and PID 08.28.19.docx; Additional Antimicrobial Registration Review Actions -- Background 1-Pagers.docx; Upcoming Antimicrobial Registration Review Actions.docx; Structural-Commodity Fumigants One Pager for AA_9-16-2019.docx; Pyrethroids Registration Review Summary for Non-Agricultural Chemicals 9_16_19.docx; Soil Fumigants One Pager for AA_9-16-2019.docx

Resending these in preparation for the briefing Monday on the registration review pipeline. Also added the recently received last 3 on structural fumigants, soil fumigants, and pyrethroids so that they are all in one place. Reminder these are summaries of the pesticides with upcoming deliverables that may be of increased interest and/or warrant additional briefings. These actions were anticipated for release at the end of September.

Please let me know if you have any questions.

Ruth-please include these in the Friday evening binders.

Attached are 1-pagers for:

- PIDs for two mothball active ingredients
- DRA for tebupirimphos
- PID for GnRH

- DRA for pentachlorophenol
- DRA for creosote
- PID for chlorine gas
- PID for the antimicrobial uses of:
 - Dazomet
 - Metam Sodium
 - Chloropicrin
- PID for MITC
- PID for Tricloan
- DRA for Chromated Arsenicals
- DRA for Dichromic Acid
- DRA for Irgarol

- Structural Fumigants
- Pyrethroids
- Soil Fumigants

From: Keller, Kaitlin

Sent: Tuesday, September 10, 2019 4:20 PM

To: Alexandra Dunn (dunn.alexandra@epa.gov) <dunn.alexandra@epa.gov>; Fischer, David <Fischer.David@epa.gov>

Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>

Subject: FW: FOR IO REVIEW: Summaries of Upcoming Registration Review Deliverables

Resending as discussed in the OPP General.

From: Keller, Kaitlin

Sent: Thursday, August 29, 2019 12:49 PM

To: Alexandra Dunn (dunn.alexandra@epa.gov) <dunn.alexandra@epa.gov>; Fischer, David <Fischer.David@epa.gov>

Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>

Subject: FOR IO REVIEW: Summaries of Upcoming Registration Review Deliverables

Alex & David,

As discussed in the OPP General last week, OPP has reviewed the draft risk assessments, proposed interim decisions, and interim decisions coming down the pike **Ex. 5 Deliberative Process (DP)**. As a first cut, attached are summaries of the chemicals that may be of increased interest and/or warrant additional briefings. Summaries for the fumigants are still in the works and will be sent separately.

Please let me know how you'd like to proceed. This might be a topic for one of your generals? Or if you'd like to schedule some time to talk through with Rick please let me know. In terms of timing, it would be helpful to have your first look in the next week or so to prepare to get OPP working on any additional briefings and/or comms materials, make changes to FRNs, etc.

Finally- just worth noting that there are only 5 attachments but that is a bit of a red herring—one attachment includes 8 chemicals and one attachment includes 3 chemicals. The full list of what is attached is below (but most are less than a page).

Attached are 1-pagers for:

- PIDs for two mothball active ingredients
- DRA for tebupirimphos
- PID for GnRH

- DRA for pentachlorophenol
- DRA for creosote
- PID for chlorine gas
- PID for the antimicrobial uses of:
 - Dazomet
 - Metam Sodium
 - Chloropicrin
- PID for MITC
- PID for Tricloan
- DRA for Chromated Arsenicals
- DRA for Dichromic Acid
- DRA for Irgarol

Kaitlin Keller, Special Assistant
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-7098

Message

From: Han, Kaythi [Han.Kaythi@epa.gov]
Sent: 8/6/2019 5:51:32 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]
CC: Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Daguiard, Robert [Daguiard.Robert@epa.gov]; Altieri, Sonia [Altieri.Sonia@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]
Subject: FW: Let's get ready to respond to this....I may get an inquiry ASAP

Importance: High

FYI

Kaythi Han
Acting Communications Director
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-6233 | han.kaythi@epa.gov

From: Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>
Sent: Tuesday, August 06, 2019 9:24 AM
To: Han, Kaythi <Han.Kaythi@epa.gov>
Subject: FW: Let's get ready to respond to this....I may get an inquiry ASAP
Importance: High

See below.

Greg Siedschlag
Chief, Communication Services Branch
Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: (703) 603-9044
Cell: (571) 255-0284
<https://www.epa.gov/pesticides>

From: Evans, Elizabeth <Evans.Elizabeth@epa.gov>
Sent: Tuesday, August 06, 2019 8:25 AM
To: Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>
Subject: RE: Let's get ready to respond to this....I may get an inquiry ASAP
Importance: High

Good morning Greg- please see my comments below in red- I highlighted in yellow the inaccuracies

From: Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>
Sent: Monday, August 5, 2019 4:42 PM
To: Evans, Elizabeth <Evans.Elizabeth@epa.gov>
Subject: FW: Let's get ready to respond to this....I may get an inquiry ASAP

Hi Liz,

See below. Can you highlight the sections in this article that you think we get could follow-up questions about from media, as well as the sections that are misleading, inaccurate, or miss an important nuance? Tomorrow morning is fine.

Thanks,

Greg Siedschlag
Chief, Communication Services Branch
Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: (703) 603-9044
Cell: (571) 255-0284
<https://www.epa.gov/pesticides>

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Monday, August 05, 2019 4:14 PM
To: Daguiard, Robert <Daguiard.Robert@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>
Cc: Keigwin, Richard <Keigwin.Richard@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Kadeli, Lek <Kadeli.Lek@epa.gov>
Subject: Let's get ready to respond to this....I may get an inquiry ASAP

News

EPA Shrinks Childrens' Safety Margin for Class of Pesticides

Posted Aug. 2, 2019, 5:52 PM
By Adam Allington

- Pyrethroids are common agricultural and household insecticides
- EPA says new data shows no need for extra protective factor for children

Ex. 5 Deliberative Process (DP)

New Conclusion

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Causes for Potential Concern

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 8/6/2020 12:44:05 PM
To: Keigwin, Richard [Keigwin.Richard@epa.gov]; Dennis, Allison [Dennis.Allison@epa.gov]
CC: Grable, Melissa [Grable.Melissa@epa.gov]; Lieberman, Paige [Lieberman.Paige@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Giddings, Daniel [giddings.daniel@epa.gov]; Mills, Madeline [Mills.Madeline@epa.gov]; Bolen, Derrick [bolen.derrick@epa.gov]; Hughes, Hayley [hughes.hayley@epa.gov]; Rosen, Bailey [Rosen.Bailey@epa.gov]
Subject: RE: For Alex/Review Review: Consumer Reports; Re: FQPA; DDL Today

That's what I guessed. So do we have past responses to Consumer Reports for context here? I want us to learn from the past.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency
Washington, DC

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Thursday, August 6, 2020 8:38 AM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Lieberman, Paige <Lieberman.Paige@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Giddings, Daniel <giddings.daniel@epa.gov>; Mills, Madeline <Mills.Madeline@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Hughes, Hayley <hughes.hayley@epa.gov>; Rosen, Bailey <Rosen.Bailey@epa.gov>
Subject: RE: For Alex/Review Review: Consumer Reports; Re: FQPA; DDL Today

Ex. 5 Deliberative Process (DP)

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Thursday, August 06, 2020 8:23 AM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Dennis, Allison <Dennis.Allison@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Lieberman, Paige <Lieberman.Paige@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Giddings, Daniel <giddings.daniel@epa.gov>; Mills, Madeline <Mills.Madeline@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Hughes, Hayley <hughes.hayley@epa.gov>; Rosen, Bailey <Rosen.Bailey@epa.gov>
Subject: RE: For Alex/Review Review: Consumer Reports; Re: FQPA; DDL Today

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention

From: Keigwin, Richard <Keigwin.Richard@epa.gov>

Sent: Wednesday, August 5, 2020 6:36 PM

To: Dennis, Allison <Dennis.Allison@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>

Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Lieberman, Paige <Lieberman.Paige@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Giddings, Daniel <giddings.daniel@epa.gov>; Mills, Madeline <Mills.Madeline@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Hughes, Hayley <hughes.hayley@epa.gov>; Rosen, Bailey <Rosen.Bailey@epa.gov>

Subject: RE: For Alex/Review Review: Consumer Reports; Re: FQPA; DDL Today

See proposed edits below in red.

Ex. 5 Deliberative Process (DP)

From: Dennis, Allison <Dennis.Allison@epa.gov>

Sent: Wednesday, August 05, 2020 4:58 PM

To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>

Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Lieberman, Paige <Lieberman.Paige@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Giddings, Daniel <giddings.daniel@epa.gov>; Mills, Madeline <Mills.Madeline@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Hughes, Hayley <hughes.hayley@epa.gov>; Rosen, Bailey <Rosen.Bailey@epa.gov>

Subject: For Alex/Review Review: Consumer Reports; Re: FQPA; DDL Today

Proposed responses for your review. Thank you! -Allison

1. **10-FOLD SAFETY FACTOR.** I'm wondering about how and when the EPA applies the additional 10-fold safety factor as outlined in FQPA to various pesticide tolerances. . First, why was the 10-fold safety factor first applied to pyrethroids, but then recently removed? How does the EPA decide to change the FQPA safety factor it's been applying to a pesticide? And why have you decided not to apply the FQPA safety factor to most of the non-organophosphate pesticides that it has reviewed in recent years? Also, is the FQPA 10-fold safety factor currently applied to chlorpyrifos?

Ex. 5 Deliberative Process (DP)

2. **ENDOCRINE DISRUPTION.** Given that the FQPA mandates that the EPA evaluate pesticides for their endocrine disrupting potential, what progress has the agency made on that front? Why has EPA completed a full evaluation of the endocrine disrupting potential of only 52 pesticides since 1996? And to what extent do tests for potential endocrine disruption factor into the standard guideline studies required for registration or re-registration of a pesticide active ingredient?

Ex. 5 Deliberative Process (DP)

3. **PROGRESS ON FQPA GOALS.** Overall, what progress has the EPA made in the last 24 years to enact the provisions of the FQPA? And what progress has the agency made in bringing its standards for safety evaluations of pesticides in line with the latest science on the potential human health effects of pesticides?

Ex. 5 Deliberative Process (DP)

From: Labbe, Ken <Labbe.Ken@epa.gov>

Sent: Thursday, July 30, 2020 8:54 AM

To: Dennis, Allison <Dennis.Allison@epa.gov>; Lieberman, Paige <Lieberman.Paige@epa.gov>; OPP FEAD CSB <OPP_FEAD_CSB@epa.gov>

Subject: FW: query from Consumer Reports

Hi all,

Pls see inquiry below. Deadline is 8/4.

Thanks!

From: Catherine Roberts <catherine.roberts@consumer.org>

Sent: Thursday, July 30, 2020 8:00 AM

To: Press <Press@epa.gov>

Cc: Patricia Calvo <trisha.calvo@consumer.org>

Subject: query from Consumer Reports

Hello,

I'm a journalist with Consumer Reports and I'm working on a story for the October issue of the magazine about pesticides on fruits and vegetables based on our analysis of the USDA Pesticide

Data Program results I'm hoping you can answer a few questions we have about how and when the EPA calculates its risk tolerances and the way the agency is executing against the mandates of the FQPA. My questions fall into three main areas.

1. **10-FOLD SAFETY FACTOR.** I'm wondering about how and when the EPA applies the additional 10-fold safety factor as outlined in FQPA to various pesticide tolerances. . First, why was the 10-fold safety factor first applied to pyrethroids, but then recently removed? How does the EPA decide to change the FQPA safety factor it's been applying to a pesticide? And why have you decided not to apply the FQPA safety factor to most of the non-organophosphate pesticides that it has reviewed in recent years? Also, is the FQPA 10-fold safety factor currently applied to chlorpyrifos?
2. **ENDOCRINE DISRUPTION.** Given that the FQPA mandates that the EPA evaluate pesticides for their endocrine disrupting potential, what progress has the agency made on that front? Why has EPA completed a full evaluation of the endocrine disrupting potential of only 52 pesticides since 1996? And to what extent do tests for potential endocrine disruption factor into the standard guideline studies required for registration or re-registration of a pesticide active ingredient?
3. **PROGRESS ON FQPA GOALS.** Overall, what progress has the EPA made in the last 24 years to enact the provisions of the FQPA? And what progress has the agency made in bringing its standards for safety evaluations of pesticides in line with the latest science on the potential human health effects of pesticides?

Thank you for your help. I would appreciate a response by Tuesday, August 4.

Best,
Catherine Roberts

--
Catherine Roberts

Consumer Reports
Associate Editor, Health
918-361-7115 (m)

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Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 11/8/2019 2:20:53 PM
To: Han, Kaythi [Han.Kaythi@epa.gov]
CC: Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Daguiard, Robert [Daguiard.Robert@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]
Subject: RE: comms on pyrethroids
Attachments: Pyrethroids 11.8.2019ADD.docx

The statement and backpocket Q&As are fine. I made a number of changes to the "factsheet". Ready for OPA.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

From: Han, Kaythi <Han.Kaythi@epa.gov>
Sent: Thursday, November 7, 2019 5:56 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>
Cc: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Daguiard, Robert <Daguiard.Robert@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: FW: comms on pyrethroids

Hi Alex,

Ex. 5 Deliberative Process (DP)

Kaythi Han
Acting Communications Director
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-6233 | han.kaythi@epa.gov

From: Keller, Kaitlin <keller.kaitlin@epa.gov>
Sent: Thursday, November 07, 2019 1:09 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Alex-I understand and have revised the document to hopefully provide more clarity.

Ex. 5 Deliberative Process (DP)

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Thursday, November 7, 2019 12:34 PM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguillard, Robert <Daguillard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

I'm sorry but this document gets more confusing each version. See my comments.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

From: Keller, Kaitlin <keller.kaitlin@epa.gov>
Sent: Thursday, November 7, 2019 9:40 AM
To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguillard, Robert <Daguillard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Attaching an updated one pager to reflect Alex's edits from this morning (moved a few bullets up and added a line about the eco mitigation proposal). Please let me know if anything else is needed.

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Thursday, November 7, 2019 9:37 AM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguillard, Robert <Daguillard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Ex. 5 Deliberative Process (DP)

I hope you will begin to see results as early as next week.

Thank you for your patience and your candor. We will get this right.

Carol Ann Siciliano
Senior Advisor
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, Room 3111A, EPA East
Washington, DC 20450

(202) 564-5489

siciliano.carolann@epa.gov

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Thursday, November 07, 2019 8:15 AM

To: Han, Kaythi <Han.Kaythi@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>

Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>

Subject: RE: comms on pyrethroids

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.

Assistant Administrator

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

(202) 564-2910

dunn.alexandra@epa.gov

From: Han, Kaythi <Han.Kaythi@epa.gov>

Sent: Wednesday, November 6, 2019 6:57 PM

To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>

Subject: RE: comms on pyrethroids

Wednesday evening update--

Draft comms consists of:

- 1) desk statement
- 2) web edits clarifying the FQPA safety factor
- 3) email announcement
- 4) backpocket Q/As

Ex. 5 Deliberative Process (DP)

That's all the pyrethroids news I have at the moment. Will resume work on the moving parts tomorrow!

Kaythi Han
Acting Communications Director
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-6233 | han.kaythi@epa.gov

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Wednesday, November 06, 2019 4:08 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Subject: RE: comms on pyrethroids

Ex. 5 Deliberative Process (DP)

Carol Ann Siciliano
Senior Advisor
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, Room 3111A, EPA East
Washington, DC 20450
(202) 564-5489
siciliano.carolann@epa.gov

From: Siciliano, CarolAnn
Sent: Wednesday, November 06, 2019 3:21 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: RE: comms on pyrethroids

Thanks for letting us know. We're on it. (Happily, this is the pyrethroids PID addressing only eco risk; the HH/safety factor PID is set for December.)

Carol Ann Siciliano
Senior Advisor
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency

1200 Pennsylvania Ave., NW, Room 3111A, EPA East
Washington, DC 20450
(202) 564-5489
siciliano.carolann@epa.gov

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Wednesday, November 06, 2019 3:03 PM

To: Han, Kaythi <Han.Kaythi@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>

Subject: comms on pyrethroids

I did push this one to the FR; want to make sure we have any comms ready as on the hot pesticide list.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 11/7/2019 11:39:21 PM
To: Han, Kaythi [Han.Kaythi@epa.gov]
CC: Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Daguiard, Robert [Daguiard.Robert@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]
Subject: Re: comms on pyrethroids

I will review at home since the First attachment is not opening properly on my phone.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, DC

Sent from my iPhone

On Nov 7, 2019, at 5:55 PM, Han, Kaythi <Han.Kaythi@epa.gov> wrote:

Hi Alex,

Attached is the document containing the draft statement and backpocket questions on our action. 

Ex. 5 Deliberative Process (DP)

I recognize that this is not the model for comms development that we want to have in place. I'll work diligently to make sure this doesn't happen again.

Kaythi Han
Acting Communications Director
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-6233 | han.kaythi@epa.gov

From: Keller, Kaitlin <keller.kaitlin@epa.gov>
Sent: Thursday, November 07, 2019 1:09 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Alex-I understand and have revised the document to hopefully provide more clarity.

Ex. 5 Deliberative Process (DP)

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Thursday, November 7, 2019 12:34 PM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

I'm sorry but this document gets more confusing each version. See my comments.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

From: Keller, Kaitlin <keller.kaitlin@epa.gov>
Sent: Thursday, November 7, 2019 9:40 AM
To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Attaching an updated one pager to reflect Alex's edits from this morning (moved a few bullets up and added a line about the eco mitigation proposal). Please let me know if anything else is needed.

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Thursday, November 7, 2019 9:37 AM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Ex. 5 Deliberative Process (DP)

I hope you will begin to see results as early as next week.

Thank you for your patience and your candor. We will get this right.

Carol Ann Siciliano
Senior Advisor
Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, Room 3111A, EPA East
Washington, DC 20450
(202) 564-5489
siciliano.carolann@epa.gov

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Thursday, November 07, 2019 8:15 AM
To: Han, Kaythi <Han.Kaythi@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

From: Han, Kaythi <Han.Kaythi@epa.gov>
Sent: Wednesday, November 6, 2019 6:57 PM
To: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Cc: Daguiard, Robert <Daguiard.Robert@epa.gov>
Subject: RE: comms on pyrethroids

Wednesday evening update--

Draft comms consists of:

- 1) desk statement
- 2) web edits clarifying the FQPA safety factor
- 3) email announcement
- 4) backpocket Q/As

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

That's all the pyrethroids news I have at the moment. Will resume work on the moving parts tomorrow!

Kaythi Han
Acting Communications Director
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-6233 | han.kaythi@epa.gov

From: Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>
Sent: Wednesday, November 06, 2019 4:08 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>
Subject: RE: comms on pyrethroids

Ex. 5 Deliberative Process (DP)

Carol Ann Siciliano
Senior Advisor
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, Room 3111A, EPA East
Washington, DC 20450
(202) 564-5489
siciliano.carolann@epa.gov

From: Siciliano, CarolAnn
Sent: Wednesday, November 06, 2019 3:21 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: RE: comms on pyrethroids

Thanks for letting us know. We're on it.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Carol Ann Siciliano
Senior Advisor
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, Room 3111A, EPA East
Washington, DC 20450
(202) 564-5489
siciliano.carolann@epa.gov

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Wednesday, November 06, 2019 3:03 PM

To: Han, Kaythi <Han.Kaythi@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>

Subject: comms on pyrethroids

I did push this one to the FR; want to make sure we have any comms ready as on the hot pesticide list.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

<Pyrethroids rvsd 11.6.2019addkk.docx>

<Pyrethroids and Pyrethrins Statement and Backpocket QAs 11-7-19.docx>

Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 4/22/2020 7:22:06 PM
To: Grable, Melissa [Grable.Melissa@epa.gov]
Subject: RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids
Attachments: AL-20-000-1569 Sanders pyrethroids letter_ADD.pdf

At last, all set.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency
Washington, DC

From: Grable, Melissa <Grable.Melissa@epa.gov>
Sent: Wednesday, April 22, 2020 2:25 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>
Subject: RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Here it is with the date corrected.

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Wednesday, April 22, 2020 12:16 PM
To: Grable, Melissa <Grable.Melissa@epa.gov>
Subject: RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Same problem here, no auto pop.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency
Washington, DC

From: Grable, Melissa <Grable.Melissa@epa.gov>
Sent: Tuesday, April 21, 2020 3:03 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>
Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Giddings, Daniel <giddings.daniel@epa.gov>
Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Alex,

Attached is the Sen. Sanders response prepared for your signature. I am hoping that the date is auto-populated in case you don't get a chance to sign it today, but if you do need me to change the date, please let me know. I have another letter that will be coming soon also for your signature.

Thanks,
Melissa

From: Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Sent: Monday, April 13, 2020 1:57 PM
To: Grable, Melissa <Grable.Melissa@epa.gov>
Subject: RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Melissa - Revised version looks ok. Thanks,
Sven

Sven-Erik Kaiser
U.S. EPA
Office of Congressional and Intergovernmental Relations
1200 Pennsylvania Ave., NW (1305A)
Washington, DC 20460
202-566-2753 (o)
202-591-0619 (c)

From: Grable, Melissa
Sent: Monday, April 13, 2020 12:56 PM
To: Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Sven,

Ex. 5 Deliberative Process (DP)

I recognize that we will need to get this on the letterhead you provided.

Thanks,
Melissa

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Monday, April 13, 2020 12:48 PM
To: Tyler, Tom <Tyler.Tom@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>
Subject: RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

This answer is cleared to go to Sven and OCIR!

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
US Environmental Protection Agency
Washington, DC

From: Tyler, Tom <Tyler.Tom@epa.gov>
Sent: Sunday, April 12, 2020 8:23 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>
Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>
Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi, Alex –

Ex. 5 Deliberative Process (DP)

Is this still with you? If so, do you need, or would you like us to do, anything else?

Thanks!

Tom

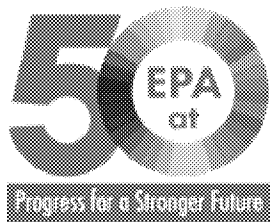
Tom Tyler, Chief of Staff

Office of Chemical Safety and Pollution Prevention

United States Environmental Protection Agency

1200 Pennsylvania Avenue NW (MC 7101M), Washington, DC 20460

w202.566.0808 c202.770.6608 tyler.tom@epa.gov OCSPP/IO 3148A East



From: Tyler, Tom <Tyler.Tom@epa.gov>

Sent: Monday, March 30, 2020 3:12 PM

To: Dunn, Alexandra <dunn.alexandra@epa.gov>

Cc: Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>

Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Alex, OPP has modified the attached letter and I have signed off. The attachments have “show changes” and “clean” versions. The original letter is partly missing in CMS, so we’re trying to track that down, but I do believe the new draft is responsive.

Danny/Ruth, Please add to Alex’s eBinder, or however you handle correspondence coming in for review.

Thanks!

Tom

Tom Tyler, Chief of Staff

Office of Chemical Safety and Pollution Prevention

United States Environmental Protection Agency

1200 Pennsylvania Avenue NW (MC 7101M), Washington, DC 20460

w202.566.0808 c202.770.6608 tyler.tom@epa.gov OCSPP/IO 3148A East

From: Grable, Melissa <Grable.Melissa@epa.gov>

Sent: Monday, March 30, 2020 1:53 PM

To: Tyler, Tom <Tyler.Tom@epa.gov>

Subject: RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Tom,

I am working on trying to get some correspondence items moving again. First up is the Sen. Sanders letter on pyrethroids. This was on its way for final signature when I received the following comments:

Ex. 5 Deliberative Process (DP)

I made a few updates to the letter (see attached for a track changes version and a clean version) that I hope address the concerns above. I have also provided the incoming letter. If you are ok with the edits, please forward it to Alex for her review. Since this is back to draft, I assume that it will need to go back to OCIR for review again. So, once Alex is ok with it, I will send it back to Sven for his review.

Thanks,
Melissa

From: Grable, Melissa
Sent: Thursday, February 27, 2020 8:56 PM
To: Tyler, Tom <Tyler.Tom@epa.gov>
Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Tom,

You had asked for a few points on the issues with the Sanders response to share with Ruth, Danny, and Mary. Before I shared it with them, I wanted to make sure that I accurately captured your concerns:

Ex. 5 Deliberative Process (DP)

If this accurately captures your concerns, I will share this information with Ruth, Danny, and Mary, and, of course, work with the program to make these edits. Who will be reviewing correspondence while you are out of the office?

Thanks,
Melissa

From: Malloy, Marilyn <Malloy.Marilyn@epa.gov>
Sent: Tuesday, February 25, 2020 1:22 PM
To: Grable, Melissa <Grable.Melissa@epa.gov>
Cc: Malloy, Marilyn <Malloy.Marilyn@epa.gov>
Subject: RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Melissa,

I placed the signature package in your chair. Please print out the control slip to be included in the signature package. I am currently unable to log into CMS.

Thanks much

Marilyn

From: Grable, Melissa <Grable.Melissa@epa.gov>
Sent: Friday, February 21, 2020 11:08 AM
To: Malloy, Marilyn <Malloy.Marilyn@epa.gov>
Cc: Hanley, Mary <Hanley.Mary@epa.gov>
Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Marilyn,

Would you please print the signature package for this Sen. Sanders letter which Sven cleared, and deliver the package to me (I sit just outside of Tom's office)? The attached version does not have any highlighted (live) links.

Thank you,
Melissa

From: Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Sent: Friday, February 21, 2020 10:32 AM
To: Grable, Melissa <Grable.Melissa@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>
Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Cleared for PCSPP signature with no edits! Please make sure the final signed version doesn't have highlighted (live) links. Thanks,
Sven

Sven-Erik Kaiser
U.S. EPA
Office of Congressional and Intergovernmental Relations
1200 Pennsylvania Ave., NW (1305A)
Washington, DC 20460
202-566-2753 (o)
202-591-0619 (c)

From: Grable, Melissa <Grable.Melissa@epa.gov>
Sent: Thursday, February 13, 2020 12:09 PM
To: Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>
Cc: Hanley, Mary <Hanley.Mary@epa.gov>
Subject: FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Sven,

Attached is the draft response (CMS# AL-20-000-1569) to Sen. Bernie Sanders, regarding his inquiry on pyrethroids. Please let me know if you have any edits or questions.

Thanks,
Melissa

Melissa Grable, Special Assistant
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-5198

Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 11/7/2019 10:47:15 AM
To: Keller, Kaitlin [keller.kaitlin@epa.gov]
CC: Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Han, Kaythi [Han.Kaythi@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]
Subject: Re: For your review: pyrethroids safety factor one pager

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, DC

Sent from my iPhone

> On Nov 6, 2019, at 5:54 PM, Keller, Kaitlin <keller.kaitlin@epa.gov> wrote:
>

Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 8/21/2019 2:43:02 AM
To: Hanley, Mary [Hanley.Mary@epa.gov]; Fischer, David [Fischer.David@epa.gov]
Subject: The rest of the factsheets
Attachments: Clean Revised Sodium Cyanide Factsheet.V2ADD.docx; Glyphosate DRAFT 8.13.2019.V2ADD.docx; Invora One-Pager DRAFT 8.13.2019.docx with DF comment.V2ADD.docx; OCSPP-1_asbestos.docx with DF comments.V4ADD.docx; OCSPP-7 ESA and FIFRA.V2ADD.docx; OCSPP-11 Lead_.docx with DF comments.V3.docx; OCSPP-16 - Non-Animal Testing final. with DF comments.V3ADD.docx; Paraquat DRAFT 8.14.2019.docx with DF comment.V2ADD.docx; Prop 65 DRAFT 8.13.2019.docxwith DF comment.V2ADD.docx; Pyrethroids DRAFT 8.13.2019.docx with DF comments.V2ADD.docx; UPDATED. IARC fact sheet DRAFT 8.15.2019_ORD edits RPK.docxwith DF comments.V2ADD.docx

As noted, these all need work but can be done tomorrow and meet OCIR's deadline – LMK if any questions.

In a number of cases I direct to where the better talking points can be found – in back pocket Q&As, pressers, etc. Also I will fwd remarks on the ESA we wrote for the Administrator that I would like to be used in part to get the messaging right on the ESA paper.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

Message

From: Dunn, Alexandra [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=426D0177EAAB4001A5C85F051565997E-DUNN, ALEXA]
Sent: 8/12/2019 8:45:28 PM
To: Daguiard, Robert [Daguiard.Robert@epa.gov]
CC: Han, Kaythi [Han.Kaythi@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]
Subject: Re: ALEX: INSIDE EPA - recent pyrethroid FQPA announcement - Urgent

Okay. Still sticky but best we can do.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety & Pollution Prevention
U.S. Environmental Protection Agency
Washington, DC

Sent from my iPhone

On Aug 12, 2019, at 4:14 PM, Daguiard, Robert <Daguiard.Robert@epa.gov> wrote:

How about this?

Ex. 5 Deliberative Process (DP)

Cheers, R.

Robert Daguiard
Communications Officer (Detail)
Office of Chemical Safety
and Pollution Prevention
U.S. Environmental Protection Agency
Washington, DC
+1 (202) 564-6618 (O)
+1 (202) 360-0476 (M)

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Monday, August 12, 2019 2:36 PM
To: Daguiard, Robert <Daguiard.Robert@epa.gov>
Cc: Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: RE: ALEX: INSIDE EPA - recent pyrethroid FQPA announcement - Urgent

See below.

From: Daguillard, Robert <Daguillard.Robert@epa.gov>
Sent: Monday, August 12, 2019 1:51 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>
Cc: Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: RE: ALEX: INSIDE EPA - recent pyrethroid FQPA announcement - Urgent

Does this OCHP response work better for you?

Ex. 5 Deliberative Process (DP)

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
Sent: Monday, August 12, 2019 11:02 AM
To: Daguillard, Robert <Daguillard.Robert@epa.gov>
Cc: Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>
Subject: RE: ALEX: INSIDE EPA - recent pyrethroid FQPA announcement - Urgent

Not sure I like the OCHP response. Can we do better?

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

From: Daguillard, Robert <Daguillard.Robert@epa.gov>
Sent: Friday, August 9, 2019 11:04 PM

To: Dunn, Alexandra <dunn.alexandra@epa.gov>

Cc: Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>

Subject: ALEX: INSIDE EPA - recent pyrethroid FQPA announcement

Reviewed by Ed Messina, HED and PRD. OK to send?

Ex. 5 Deliberative Process (DP)

Robert Daguillard
Communications Officer (Detail)
Office of Chemical Safety
and Pollution Prevention
U.S. Environmental Protection Agency
Washington, DC
+1 (202) 564-6618 (O)
+1 (202) 360-0476 (M)

Begin forwarded message:

From: Maria Hegstad <mhegstad@iwpnews.com>
Date: August 8, 2019 at 6:49:00 PM EDT
To: "Daguillard, Robert" <Daguillard.Robert@epa.gov>
Subject: recent pyrethroid FQPA announcement

Hi Robert,

I've got a short deadline I'm working on a story about the recent announcement from OPP about the FQPA safety factor for pyrethroid pesticides. The July 1 re-evaluation document linked in the announcement does not appear to explain why/how the concerns raised by the peer review panel in their 2018 report have been addressed.

For example, the peer review panel said that the PBPK model was not ready for use and raised a number of questions about its application to the FQPA factor question. As one example, the panel questioned why CAPHRA considered a 19-year-old male to be the most susceptible to pyrethroid exposure, when the panel thought that an infant less than 5 months of age would be most susceptible. Does OPP address these issues somewhere that I missed? Or can you explain?

Also, can you comment on whether OCHP was involved in the pyrethroid FQPA factor decision?

I am working on a Friday 1 pm deadline.

Many thanks, Maria

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Message

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Subject: RE: OCSPP News for August 28, 2020

Thanks Comms Team! These are great and very helpful!!!!

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From: Rosen, Bailey <Rosen.Bailey@epa.gov>
Sent: Friday, August 28, 2020 4:56 PM
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Subject: OCSPP News for August 28, 2020

OCSPP News Round-Up

TSCA

- Politico Pro 8/28; [EPA advisers warn of 'low confidence' in asbestos risk study](#)
- Bloomberg Law 8/28; [Bloomberg: EPA Panel Slams Asbestos Analysis as 'Optimistic,' Lacking Data](#)
- Inside TSCA 8/27; [EDF Analysis Finds EPA's Assumption On PPE Eases New Chemical Rules](#)
- Inside TSCA 8/27; [Environmentalists Urge States To Press EPA For More Robust TSCA Program](#)
- Inside TSCA 8/27; [ACC Sees 'Perverse' Effect From States' Plan To Bar Packaging](#)
- Inside TSCA 8/27; [Quote-Unquote: EPA on TSCA fees, deadlines and evaluations](#)

Pesticides

- Reuters 8/27; [Bayer acknowledges 'bumps' in \\$11 billion Roundup deal after judge raises doubts](#)
- Bloomberg Business 8/27; [Bayer's \\$11 Billion Roundup Deal Faces New Concerns From Judge](#)
- Consumer Reports 8/27; [Stop Eating Pesticides](#)

Blogs/OpEd/Other

- Bergeson & Campbell Blog 8/27; [EPA Proposes to Extend ICR Regarding TSCA Section 8\(a\) Reporting and Recordkeeping Requirements for Certain Nanoscale Materials](#)

- Beyond Pesticides Blog 8/28; EPA Threatens Public Health, Waiving Safety Review of Disinfectants To Be Used by American Airlines and Health Care Facilities; Need Questioned while More Uses Expected

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EPA advisers warn of 'low confidence' in asbestos risk study

Alex Guillén, Politico Pro

<https://subscriber.politicopro.com/energy/article/2020/08/epa-advisers-warn-of-low-confidence-in-asbestos-risk-study-1986989>

An EPA panel of advisers on Friday dinged the agency's draft study of the risks posed by asbestos, complaining that the agency has not studied certain types of asbestos or all the ways in which people are exposed, leaving the study "deficient."

Background: EPA's draft risk evaluation for asbestos released in March flagged risks from the only remaining use of imported asbestos in the U.S. — to make diaphragms used by some chlorine-production facilities. The agency also found risks from some imported asbestos-containing products such as auto parts.

The report: In a peer review released on Friday, EPA's Science Advisory Committee on Chemicals criticized the draft evaluation for being too narrowly crafted and ignoring several types of asbestos, exposure pathways and health risks.

"EPA's environmental and human health risk evaluations for asbestos was not considered adequate and resulted in low confidence in the conclusions," the report said.

The SACC noted that EPA studied only exposures to chrysotile asbestos, the most common of the six asbestos fibers, and it recommended EPA look at other fiber types. It also called on EPA to study additional exposure sources, including via drinking water and in talc, and "legacy" uses such as "the huge existing reservoir of asbestos-containing building materials" around the U.S. Without considering all of those sources, "the estimate for total exposure to asbestos is deficient," the report said.

The report also questioned EPA's decision to restrict health risks studied to only lung cancer and mesothelioma. And "concerns were raised over completeness and representativeness of industry data," the report said.

It also questioned EPA's assertion that some risks can be managed through the use of personal protective equipment. Such protection "critically depends on the quality and actual use of the workplace respiratory protection program, which is a frequent source of violations cited by OSHA in recent years."

What's next: "EPA is in the process of reviewing the SACC's report and will use the feedback received from the peer review and the many public comments to improve the final risk evaluation," the agency said.

EPA has missed the statutory deadline to finalize this and most of the other first ten chemical reviews under the revised Toxic Substances Control Act, but the agency says it aims to finishing the asbestos review by the end of the year.

EPA has already begun work on a separate process to study the risks of legacy asbestos uses following a 2019 court ruling on that matter. The agency said it hopes to have a draft scoping document out later this year; the full process could take until 2024 or later to identify risks.

Bloomberg: EPA Panel Slams Asbestos Analysis as 'Optimistic,' Lacking Data

Pat Rizzuto, Bloomberg Law

<https://news.bloomberglaw.com/environment-and-energy/epa-panel-slams-asbestos-analysis-as-optimistic-lacking-data>

The EPA's preliminary analysis of health problems caused by continued asbestos use is inadequate and underestimates risks from the cancer-causing mineral, a panel of agency advisers said Friday.

The Environmental Protection Agency's draft risk evaluation includes several acknowledgments that the agency may "underestimate" asbestos' potential to injure workers and consumers.

But that's "an understatement," the Science Advisory Committee on Chemicals said in its report stemming from a June meeting. The EPA failed to examine risks coming from discontinued uses of asbestos, such as its presence in buildings, that could result in ongoing human exposure, the panel said.

- "Overall, EPA's environmental and human health risk evaluations for asbestos was not considered adequate and resulted in low confidence in the conclusions," the committee said, marking its fiercest comments yet on any of the agency's 10 chemical risk evaluations that it has critiqued.
- The draft risk evaluation made numerous statements about asbestos' risks that "are based on little or no data," and reached conclusions that seem "overly optimistic," the committee said.
- The panel also urged the EPA to examine all forms of asbestos, instead of just the chrysotile fibers, or at least revise the document to make its limits clear; examine more health problems from asbestos than just lung cancer and mesothelioma; include discontinued uses of asbestos; and calculate people's total exposure to it.

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EDF Analysis Finds EPA's Assumption On PPE Eases New Chemical Rules

Rick Weber, Inside TSCA

<https://insideepa.com/tsca-news/edf-analysis-finds-epa-s-assumption-ppe-eases-new-chemical-rules>

An analysis of EPA data by the Environmental Defense Fund (EDF) shows EPA's approval of new chemicals under TSCA section 5 often assumes workers use personal protective equipment (PPE) even if they do not, allowing the agency to approve dozens of chemicals that exceed the agency's risk benchmarks in just the past few months.

The findings, spelled out in an Aug. 27 blog post by Richard Denison, lead senior scientist at EDF, offers numbers and context to an issue that is often raised, and rejected by EPA, in comments by environmentalists and other public health advocates on specific proposals for a significant new use rule (SNUR).

It also echoes concerns environmentalists and labor unions have raised over similar assumptions the agency uses in its evaluations of existing chemicals under the Toxic Substances Control Act (TSCA) -- even though agency officials have acknowledged uncertainty about how widespread PPE use is.

"The Trump EPA's blatant shirking of its clear responsibilities under TSCA to identify and mitigate the serious risks that chemicals present to workers -- who are on the front lines of chemical exposures -- surely constitutes one of its most egregious failings," Dennison writes in the blog summarizing the group's analysis of EPA's review of premanufacture notifications (PMNs) for new chemical uses.

EPA did not immediately respond to a request for comment on the EDF analysis. But a recent internal EPA memo acknowledged a 2001 NIOSH survey of private companies across a wide span of industries regarding their employees' use of respirators raises "uncertainty" about widespread use of PPE in private industry.

The Feb. 18 EPA memo, from staff within one of the risk assessment divisions in EPA's toxics office, summarizes for the branch chief and acting division director the results of the 2001 survey.

The statistics of this survey may not be representative of all industry sectors and conditions of use for a given chemical," writes Rehan Choudhary of EPA's assessment branch 5. "However, this survey-based information helps to highlight the potential uncertainty that comes with assuming widespread usage of respiratory protective equipment for estimating occupational exposures."

According to Denison, EDF examined 29 cases where EPA determined that a PMN substance "is not likely to present an unreasonable risk" since the beginning of June.

The environmental group says in 19 of those cases, the PMN review found the chemical risks to workers exceeded EPA's benchmark for dermal or inhalation exposures, or both.

In 15 cases the risks exceed EPA's dermal risk benchmark, in 10 it exceeded the inhalation benchmark, and in six cases both the dermal and inhalation risk benchmarks were exceeded, according to EDF.

EPA Statement

But, Denison writes, EPA justified its conclusions that the chemicals are "not likely" to pose an unreasonable risk by assuming workers exposed to the substances would be wearing PPE.

"EPA's response to all of these quantified and unquantified risks it identified is the same in every single case," Denison says, quoting EPA in "its presentation of the risks" with a variation of the following statement:

"However, risks can be mitigated by the use of appropriate personal protective equipment (PPE), including impervious gloves, eye protection, and respiratory protection. EPA expects that employers will require, and that workers will use appropriate PPE consistent with the Safety Data Sheet (SDS) prepared by the submitter, in a manner adequate to protect them."

"This glib statement papers over numerous glaring inaccuracies and omissions about which we have blogged and submitted comments to EPA extensively," Denison argues.

According to Denison, EDF has argued to EPA that "SDSs do not pose any binding requirements on employers to provide and train their employees on the proper use of PPE; The existence of an SDS provides no assurance that workers at downstream processing and use sites will be informed about and follow any PPE recommendations; EPA's determinations do not specify what type of PPE would be sufficient to mitigate the risks it has identified; [and] PPE is the option of last resort under the industrial hygiene hierarchy of controls."

Other groups are also urging EPA to drop its reliance on the use of PPE to set chemical risk decisions. The Environmental Protection Network, which represents about 500 former EPA officials, issued a report this month with the backing of six former agency administrators from both Democratic and Republican administrations, which calls for a significant overhaul of how the agency conducts its risk reviews under TSCA.

In its Aug. 12 report, the group lays out "immediate actions" for EPA reforms including for the agency to "commit to addressing all pathways of exposure and conditions of use, including ongoing use and disposal of legacy products; determining risks to workers without assuming the use of PPE to prevent exposure; combining risks across routes and pathways of exposure consistent with legislative intent to protect highly exposed subpopulations; assuring protection of susceptible subpopulations at higher risk than the general population as required by TSCA."

The EPN report is widely seen as a proposed policy agenda for the next administration should Democratic presidential nominee Joe Biden prevail in November, and the EDF analysis could offer an initial review of the PMN process for guiding those reforms. -- Rick Weber (rweber@iwpnews.com)

Environmentalists Urge States To Press EPA For More Robust TSCA Program

Maria Hegstad, Inside TSCA

<https://insideepa.com/tsca-news/environmentalists-urge-states-press-epa-more-robust-tsca-program>

Environmentalists are urging state drinking water officials to press EPA to implement the TSCA program more aggressively than it currently is, arguing that more rigorous evaluations and rules that address the regulators' concerns will ease the strain on drinking water programs and limit source water contamination.

"Why does TSCA matter to you?" Jonathan Kalmuss-Katz, a staff attorney with Earthjustice, asked members of the Association of State Drinking Water Administrators (ASDWA) during an Aug. 27 webinar on TSCA the group hosted. "The most basic answer is because TSCA has the potential to make all of your jobs easier," he said.

"When chemicals are well-regulated at the point of manufacture upstream, they are less likely to end up in the environment and less likely to end up in water supplies. And when chemicals are robustly evaluated . . . in the event that chemicals do get out to the environment, you have more information about their health effects, about their physical chemical properties and about other things that you would need to identify potential treatment technologies."

Kalmuss-Katz said that in contrast, "poor implementation of TSCA makes all of your jobs considerably harder and I think we're already seeing that in multiple examples across the country."

His call for the state officials to weigh in with EPA seeks to bolster environmentalists' efforts to pressure the agency to strengthen its TSCA program and to consider exposure pathways that are regulated by other agency programs and other agencies in its TSCA evaluations. The issue is already being tested in litigation over the agency's recently finalized TSCA evaluation of methylene chloride.

Some municipal drinking water utilities have already made a similar argument in relation to EPA's new chemical program, where they have urged EPA to coordinate regulatory requirements for new chemicals with drinking water protections. But the agency has rejected their suggestions, prompting utility officials to ask Congress to reform TSCA so EPA is required to consider new chemicals' impacts on drinking water when writing significant new use rules (SNURs).

"These SNURs regularly include chemicals which are highly persistent, migrate easily to groundwater, or are difficult to remove through normal wastewater treatment practices," Diane VanDe Hei, CEO of the Association of Metropolitan Water Agencies (AMWA), told lawmakers in July 28 testimony.

Other environmentalists on the ASDWA webinar echoed Kalmuss-Katz and urged the state officials to weigh in with EPA on a series of issues, including its approach to regulating new chemicals, EPA's approach to gathering data from the chemical industry, which environmentalists have long argued is too lax, and policies on confidential business information (CBI) the agency has developed following Congress' revisions to those portions of TSCA.

For example, Lindsay McCormick, a program manager with Environmental Defense Fund (EDF), urged ASDWA members to weigh in on an upcoming data call-in proposal that would allow the agency to require industry to provide existing data on chemicals listed by the Obama administration that will be the basis for the next round of chemicals slated for evaluation.

McCormick also suggested ASDWA members comment on changes EPA has proposed to an information collection request for requiring companies to generate new toxicity testing and physical-chemical property testing, which recently

closed but which she expects EPA will reopen. "If you're concerned about the lack of proposed testing on chemicals, we encourage you to comment on this as well," she said.

She also suggested that ASDWA members urge EPA's toxics office to acquire data from the agency's water office, such as occurrence data utilities provide under the agency's Unregulated Contaminant Monitoring Rules (UCMR). She noted that EPA failed to use UCMR data in the first 10 chemicals EPA is evaluating. She noted that some show significant occurrence of the substances. For example, data submitted under "UCMR 3 found 1,4-dioxane in 21% of the nearly 5,000 samples with an exceedance of EPA's own health based reference value in 7% of those," she said.

1,4-Dioxane

In his presentation, Kalmuss-Katz pointed to the example of 1,4-dioxane, a ubiquitous contaminant at waste sites and in drinking water systems and also one of the first 10 chemicals that EPA is evaluating as directed in Congress' 2016 reform of TSCA.

Pointing to a national map of the detections of 1,4-dioxane above existing standards, Kalmuss-Katz described it as "a map of the failures of TSCA. Now, 1,4-dioxane spread throughout the country unnoticed and without awareness of its health effects and we are now kind of racing to make up for the lost time and trying to deal with the consequences of that. With robust and strong incrementation of TSCA, maps like this shouldn't happen."

EPA's toxics office continues its work to finalize the 1,4-dioxane evaluation, along with the evaluations of the seven other chemicals it has yet to finalize.

But environmentalists and others raised numerous concerns with EPA's draft evaluation of the chemical and in particular, the agency's decisions to exclude from the scope of the evaluation risks stemming from exposures from consumer uses where 1,4-dioxane presents as a byproduct in limited, de minimis levels.

That is a function of the Trump administration's policy allowing the agency to exclude uses of chemicals at de minimis levels, as in byproducts or exposures that are controlled by other statutes or other agencies.

"We have some concerns with how EPA conducted these [first 10 draft] evaluations. One of the main ones is EPA excluded all air, water and soil exposures that could be addressed by other environmental laws regardless of whether those laws regulate chemical issues," Kalmuss-Katz said.

Pointing to the draft 1,4-dioxane evaluation, he noted that EPA acknowledged the chemical's "ubiquitous" presence in drinking water but excluded those exposures from the draft evaluation because the Safe Drinking Water Act (SDWA) addresses drinking water contaminants.

However, he noted that a few months ago, EPA declined to make an affirmative determination to regulate 1,4-dioxane under SDWA, because it said officials lacked adequate data.

"So this is fascinating," Kalmuss-Katz said, "EPA is saying it doesn't have to consider the unreasonable risks under TSCA because the SDWA is handling it and under the SDWA, EPA is saying we don't have enough information so we're not going to address this in that statute here. And that just leaves a lot of people exposed."

Kalmuss-Katz noted that EPA has tight regulatory deadlines from its finalization of an existing chemical's evaluation to propose and finalize risk management rules that mitigate the unreasonable risk determined. He encouraged ASDWA and its members to comment on these rules, by providing, for example, "any information you have on costs associated with treating" the chemicals.

These costs are relevant because EPA has to use cost-benefit analysis in developing its TSCA risk management rules, Kalmuss-Katz said. "When EPA is considering restrictions on [a chemical's] production or use . . . If EPA selects [a risk management option] that allows the chemical to be released into the environment ... there will still be risks and those impose costs, such as drinking water treatment ... and a range of other things."

He also said he is "excited by the potential" of the score of new existing chemical evaluations is beginning, the second batch the agency has selected to go through the evaluation process for existing chemicals. Existing chemicals are those that were on the market before the original statute was enacted in 1976 and largely grandfathered from its regulation.

Again, Kalmuss-Katz urged ASDWA members to get involved by submitting information to EPA as well as to comment on the agency's ongoing planning documents and eventual draft evaluations.

"During the comment periods on the draft evaluations, ASDWA and members have the opportunity to submit information you may have on [chemical] monitoring, the presence [of chemicals] in sludges or treatment materials, and known sources of materials . . . Sources are important because they point to conditions of use EPA should be considering." -- Maria Hegstad (mhegstad@iwpnews.com)

ACC Sees 'Perverse' Effect From States' Plan To Bar Packaging Chemicals

Diana DiGangi, Inside TSCA

<https://insideepa.com/tsc-news/acc-sees-perverse-effect-states-plan-bar-packaging-chemicals>

A leading chemical industry group is warning that a plan by a group of states to ban the use of per- and polyfluoroalkyl substances (PFAS) and phthalates, two classes of widely used chemicals, from packaging materials would have "perverse" economic consequences, cause "unwarranted alarm" and "product de-selection".

In Aug. 24 comments to the Toxics in Packaging Clearinghouse (TPCH), the American Chemistry Council (ACC) raised a series of concerns with the group's proposed model legislation, especially its effort to ban two classes of chemicals from packaging, an approach that environmentalists say will lead to more-efficient regulation of broad groups of similar substances but which ACC says is not scientifically accurate.

"Painting all chemicals that share some generic name with a broad brush makes for bad policy that can prevent consumers from accessing important, safe and beneficial products they need," ACC said of the proposed PFAS ban.

As a result, ACC says, it is concerned that the proposed model legislation will lead to "flawed regulations--and chemical assessments based on these regulations--and may create public confusion, cause unwarranted alarm, and product de-selection. All of which serves to further erode public confidence in existing chemical management programs," the group's comments say.

But the group also raised additional concerns over the proposal's failure to use a risk-based approach, potential conflict with EPA and other federal regulation and a series of other issues.

And ACC also argues the chemicals provide significant benefits in food packaging, helping to preserve food and limiting its disposal in landfills and incinerators, which release air pollution and greenhouse gases.

ACC's comments respond to draft model legislation floated earlier this year from TPCH, a group of nine states, that among other things seeks to ban PFAS and phthalates from packaging materials.

The latest draft would revise earlier model legislation adopted by 19 states that limits the "intentional use" of cadmium, lead, mercury, and hexavalent chromium in any finished package or packaging component.

The legislation seeks to place the primary compliance burden “on the supply chain by requiring manufacturers and suppliers to verify that the products they manufacture, sell, and use meet the requirements of the laws, maintain that documentation, and provide it to the public and units of government upon request,” the draft says, while expanding the existing model legislation by explicitly banning PFAS, widely used for their non-stick and water resistant qualities, from packaging while also limiting the use of phthalates, which are used to soften plastics, above 100 ppm.

The existing legislation has been adopted by TPCH’s nine member states -- including California, Washington, Connecticut, Iowa, Minnesota, New Hampshire, New York, New Jersey and Rhode Island. Ten other states have adopted all or part of the legislation, including Florida, Georgia, Pennsylvania, and Illinois.

TPCH’s plan to ban PFAS and phthalates marks just the latest indication that state officials are stepping up their efforts to limit the use of PFAS, phthalates and other chemicals in packaging and other products. For example, New York’s legislature earlier this month approved legislation barring the use of PFAS in food packaging though Gov. Andrew Cuomo (D) has not yet indicated whether he will sign it.

While such efforts have been welcomed by environmentalists, industry groups like ACC are pushing back, raising special concerns about TPCH’s plan to regulate classes of chemicals.

Diverse Group Of Chemicals

For example, ACC notes that not all PFAS have the same molecular structures or toxicities. “The term ‘PFAS’ encompasses an extremely large and diverse group of chemical compounds with widely disparate physical, chemical and hazard characteristics. The different members of this universe are not the same and should not be regulated as a single group,” ACC says.

ACC notes that certain fluoropolymers, are used in pharmaceutical packaging and have a less toxic hazard profile than other PFAS. “Given their benign hazard profile and their low exposure potential, it would be arbitrary and inappropriate to restrict the use of fluoropolymers in packaging,” ACC says.

“It could also cause significant market disruption including in critical applications such as pharmaceuticals,” the ACC writes. “Yet this is the perverse consequence that would flow from the one-size-fits-all approach of regulating all PFAS as a single group,” ACC says.

ACC similarly notes that not all phthalates are the same, adding that regulators have found that DIDP and DINP, two phthalates EPA is currently evaluating under the Toxic Substances Control Act (TSCA), are safe in food packaging.

The industry group adds that the state legislation would also conflict with regulation of packaging chemicals by EPA and the Food and Drug Administration.

“We are concerned that the proposed changes would bypass these important regulations and could have unintended consequences for product safety, packaging performance and overall life-cycle considerations such as recycling, and greenhouse gas reductions,” the comments say.

ACC also objects to TPCH’s hazard-based approach to regulation, as opposed to a risk-based approach that includes consideration of exposures.

“ACC believes decisions regarding product safety-- including packaging -- should be made using a robust, risk-based approach,” they write. “A risk-based approach considers the hazards, intended uses and exposure of the product while incorporating the best available science that takes into account weight of evidence.”

The industry group notes that not only does the proposed model legislation not take a risk-based approach but also “fails to outline exposure level requirements, thus leading to an incomplete picture of ‘risk’ that potential additives in packaging may present.”

ACC argues that the model legislation fails to establish a de minimis threshold for newly identified chemicals of high concern, leading to inconsistencies between portions of the proposal.

The chemical industry group concluded its comments by requesting a meeting with TPCP to air industry’s concerns and discuss the model legislation.

“The proposed legislation in its current form would have significant socio-economic implications including economic, public safety and sustainability impacts. These need to be carefully considered and should be fully assessed to guide any potential updates to the TPCP model legislation,” they write. “We respectfully request an opportunity to meet with TPCP to discuss how stakeholder feedback will be considered in the development of any next draft of the Model Legislation.” -- Diana DiGangi (ddigangi@iwpnews.com)

Quote-Unquote: EPA on TSCA fees, deadlines and evaluations

Inside TSCA

<https://insideepa.com/tsc-takes/quote-unquote-epa-tsc-takes-fees-deadlines-and-evaluations>

Also, Administrator Andrew Wheeler on disinfectants and PFAS.

EPA releases interim list of companies responsible for paying TSCA fees:

“Making this interim final list available now gives businesses and other stakeholders an opportunity to review the list for accuracy and provides time for businesses to engage in initial outreach regarding the formation of consortia to share in fee payments.”

-- EPA, in an Aug. 27 notice, announcing the release of its pared-back interim list of entities that will have to pay fees to help cover the cost of the agency’s next 20 risk evaluations of existing chemicals.

Wheeler seeks to carefully eliminate toxic PFAS:

“We want to make sure the ones that are toxic are taken off the market. If they are toxic to the environment, they will be taken out of the marketplace and replaced with substitutes that are safer . . . we want to make sure that we aren't doing anything to take away all of them at one time.”

-- Wheeler, during an Aug. 25 roundtable in North Carolina with Rep. Richard Hudson (R-NC) on per- and polyfluoroalkyl substances (PFAS).

EPA considers dropping numeric scoring in TSCA systematic reviews:

“Chasing the number . . . can lead you to a false sense of precision.”

-- Stan Barone, deputy director of the Risk Assessment Division within EPA’s toxics office, explaining to a National Academy of Sciences panel why the agency is considering dropping its controversial numeric scoring system for ranking studies used in TSCA evaluations.

EPA grants emergency approval for durable disinfectant:

“There is no higher priority for the Trump Administration than protecting the health and safety of Americans and I want to thank those who have worked with us to achieve this major milestone.”

-- Wheeler, during an Aug. 24 press conference, announcing first-time emergency approval for a long-lasting disinfectant to be used to limit the spread of the coronavirus on American Airlines aircraft located in Texas, as well as two local healthcare systems.

Wheeler pledges to meet 2023 TSCA deadline:

"I don't have the latest . . . we intend to have those done on time."

-- Wheeler, during an Aug. 27 press conference, pledging to complete the next 20 TSCA evaluations by the June 2023 deadline while also pledging to complete the first 10, which were due in June 2020, by the end of the year.

Bayer acknowledges 'bumps' in \$11 billion Roundup deal after judge raises doubts

Mrinalika Roy, Tom Hals & Ludwig Burger, Reuters

<https://www.reuters.com/article/us-bayer-lawsuit/bayer-roundup-11-billion-deal-at-risk-of-collapse-judge-says-bloomberg-news-idUSKBN25N2YK>

(Reuters) - Shares in German drugs company Bayer AG (BAYGn.DE) fell 3% on Friday after it said there were "bumps" in sealing its \$11 billion settlement of U.S. lawsuits over its Roundup weed killer after a U.S. judge cast doubt on the progress of the agreement.

Bayer in June struck an agreement on about 75% of the 125,000 claims stemming from its \$63 billion takeover of seed and chemical company Monsanto in 2018.

It has indicated that settling existing cases is contingent on some form of agreement on future cases, and has proposed a scientific panel to rule on any future claimants that agree to submit to the out-of court procedure.

U.S. District Judge Vince Chhabria threatened to restart the litigation and let it move forward after questioning if Bayer was going back on the settlement, according to a Bloomberg News report. ([bloom.bg/34EJ9Mj])

"There are often some bumps in the road in implementing a resolution of this magnitude, but we remain confident that a comprehensive settlement will be finalized and executed," Bayer said in a statement.

Its shares had dropped to 54.78 euros by 0936 GMT.

One of the leading lawyers involved in the Roundup litigation said he was prepared to bring cases to trial again.

"I agree that these Monsanto shenanigans need to stop. Either settle or don't — at this point the only enemy is indecision," Brent Wisner told Reuters.

Chhabria told the parties to continue to finalize the settlement and to confer about next steps should the litigation resume, scheduling a Sept. 24 hearing to discuss progress, according to a source who monitored the hearing.

Bayer said it expected litigation to remain on hold at least until then.

"While we support the court's dual track approach over the next 30 days, we are optimistic that the finalization of the settlements over this time will make any further steps on the litigation track unnecessary," it said.

Chhabria raised concerns in July over the plan to create an independent panel of scientists to assess whether glyphosate-based weedkillers such as Roundup caused cancer, delaying a key part of the proposed settlement.

Bayer's proposal to simultaneously address any future cases, which it said it remained committed to in July, is unprecedented because glyphosate will remain on the market without a cancer warning.

Chhabria said on Thursday he was inclined to make public several confidential letters from consumer lawyers complaining that Bayer's Monsanto unit is renegeing on the deal, Bloomberg News said.

Bayer's \$11 Billion Roundup Deal Faces New Concerns From Judge

Joel Rosenblatt, Bloomberg Business

<https://www.bloomberg.com/news/articles/2020-08-27/roundup-consumer-lawyers-say-bayer-welching-on-deal-judge>

- Judge voices concern company is manipulating settlement
- Lawyer for Bayer sees a 'road to a comprehensive solution'

Bayer AG's comprehensive settlement of U.S. lawsuits over its Roundup weed killer is in jeopardy after lawyers for some consumers accused the company of renegeing on the \$11 billion deal and the judge overseeing the litigation questioned its truthfulness.

U.S. District Judge Vince Chhabria said during a hearing Thursday he's concerned Bayer has "manipulated" the settlement process since announcing its plan in June to resolve 125,000 cases alleging that the herbicide causes cancer. He said he will revisit in a month whether to keep the litigation on hold for settlement talks to continue or to let more trials proceed.

"My concern is that if I leave the stay in place, am I complicit in whatever shenanigans are taking place on the Bayer side?" the judge said.

If the June deal were to break down, settlements of many cases would probably still move forward. Lawyers representing those plaintiffs expressed confidence in the negotiations.

Still, the hitches in the process create a new headache for the German pharmaceutical and chemical company just as it seemed to be moving on from a wave of litigation over Roundup and the Essure contraceptive device. The legal threat has weighed on Bayer since its 2018 acquisition of Monsanto, maker of the herbicide, with the shares losing more than a third of their value.

The stock traded 0.4% lower early Friday in Frankfurt.

Earlier Concerns

Only weeks after the Roundup settlement was announced in June, a proposed system for resolving future lawsuits was pulled after Chhabria raised objections to it. The company has appealed verdicts against it and says the product is safe.

Bayer said it remains optimistic about finalization of the deal.

"A mass tort settlement of this size and complexity can take significant time before it is fully executed, and we are still early in this process," the company said in a statement. "There are often some bumps in the road in implementing a resolution of this magnitude, but we remain confident that a comprehensive settlement will be finalized and executed."

Brent Wisner, one of the lead attorneys for consumers, told the judge "there is no settlement." He urged Chhabria to lift a pause on the litigation because the process has hit a wall.

Stop Eating Pesticides

Use CR's exclusive ratings to get the health benefits from fruits and vegetables while minimizing your risk from toxic chemicals

U.S.-grown organic and nonorganic oranges and organic fresh green beans earn an Excellent score in our ratings. But nonorganic green beans receive a Poor score.

Sinking your teeth into a crisp apple or chomping on a stalk of celery is something you should be able to do without thinking. After all, the best nutritional science shows that eating a variety of fruits and vegetables—and plenty of them—is a crucial component of good health. But produce sometimes comes with potentially harmful pesticide levels.

That's according to a new Consumer Reports analysis of five years of data from the Department of Agriculture collected from tests on fruits and vegetables to detect about 450 pesticides. In some cases, those levels exceed what CR's experts consider safe.

The solution isn't to eat less produce. More than 80 percent of Americans already fall short of the recommended amounts: at least 2½ cups of vegetables and 2 cups of fruits per day for most adults. Instead, you can minimize the risk by choosing fruits and vegetables grown with fewer and safer pesticides.

One way is to choose organic produce. "CR recommends buying organic when possible, to reduce your pesticide exposure and protect the environment and farmworkers," says Charlotte Vallaeys, the senior policy analyst at CR who led our new pesticides study. Organic standards permit some pesticides, but they can be used only after nonchemical methods, such as crop rotation, have failed. Even then, farmers can't use pesticides that could be harmful to people or the environment.

"Still, we realize organic can cost more, and that means it isn't always an option," Vallaeys says. And in many low-income communities, access to fruits and vegetables in general—let alone organic—may be limited.

To help consumers identify which produce poses the biggest risk from pesticides, CR experts developed ratings for 35 fruits and vegetables. They were organic and nonorganic, grown in the U.S. and imported. We also rated some frozen, canned, and dried items, for a total of 49 products. (See CR's produce ratings and find out which fruits and vegetables to pick, below.)

The good news: Almost half of the nonorganic fruits and vegetables pose little risk. But about 20 percent, such as fresh green beans, peaches, and potatoes, received our worst scores; those are the ones it's most important to try to buy organic. Even some organic products, such as fresh spinach, had worrisome pesticide residue. "For the lowest-scoring items, eating a half of a serving or less per day poses long-term health risks to a young child," Vallaeys says.

Pesticides and Your Health

"Pesticides are chemicals that are specifically designed to kill living organisms," says Devon Payne-Sturges, DrPH, an associate professor at the University of Maryland School of Public Health in College Park. Some of the clearest evidence of harm comes from people who work with pesticides or live in agricultural areas. The Environmental Protection Agency says agricultural pesticide exposure is tied to asthma, bronchitis, non-Hodgkin's lymphoma, Parkinson's disease, and prostate and lung cancers.

Industry groups say that such residue on food doesn't pose a risk. "A farmer's first consumer is his or her own family, so food safety is always their top priority," says Teresa Thorne, executive director of the Alliance for Food and Farming. And CropLife America, a pesticide industry group, said that half or more of items tested by the USDA show no pesticide residue.

But many experts remain concerned. Payne-Sturges says pesticides can damage the brain and nervous system. And even low levels have been linked to cancer, reproductive issues, and other health problems, she says.

Plenty of research bears this out. A 2019 study in JAMA Internal Medicine found that people with the highest levels of exposure to pyrethroid pesticides were three times as likely to die from cardiovascular disease during the 14-year study than those with less exposure. In a 2010 study in the journal Pediatrics, children with a greater exposure to organophosphate pesticides were more likely to be diagnosed with attention deficit hyperactivity disorder, known as ADHD. And a 2016 analysis in Scientific Reports found a link between pesticides and an increased risk of Alzheimer's disease.

Other evidence suggests that pesticides disrupt the endocrine system, which is made up of hormones, the glands that produce them, and the receptors in the body that respond to them. Experts think this may contribute to some cancers and other health problems. And because this system is delicate, even small amounts of endocrine disruptors could have outsized effects, says Michael Hansen, PhD, CR's senior scientist.

Yet the overall health impact of pesticides may be even greater because there are still many unanswered questions about the effects of long-term, low-dose exposure.

What Research Can't Tell Us

Scientists studying pesticides are limited in the kind of research they can conduct. Giving a group of people a pesticide-laden diet and another a pesticide-free one would provide clearer answers—but would also be unethical. So scientists turn to other types of studies.

Animal studies, which can provide clues to potential harms, are limited by significant biological differences between, say, rats and humans. And epidemiological studies—which look at groups of people, their pesticide exposure, and their health outcomes over long periods of time—can link pesticides and illness but can't prove that the chemicals caused the diseases.

Another limitation: Pesticides are usually regulated and studied by considering the effects of just a product's active ingredient. Yet pesticide formulas contain many other substances. "Some of these are called inert ingredients, which gives you the impression that they're not harmful," Payne-Sturges says. But how they might affect health is largely unknown.

Also, health effects may be compounded when multiple pesticides are used together, which frequently happens. But most studies evaluate only the effects of a single type or class of pesticide, says Brenda Eskenazi, PhD, director of the Center for Environmental Research and Children's Health at the University of California, Berkeley. "What we should be looking at is the whole swimming pool of chemicals that we're exposed to," she says.

What does this mean for consumers? "Sadly, there's a lot we don't know about the human health effects of pesticides in food," says CR's Vallaey. "Given this, it makes sense that we should err on the side of caution and base decisions about pesticide use not just on what we know but also on what we don't yet know."

Pesticides and Farmworkers

Pesticides pose special dangers to people who work with them on farms and in factories, as well as to their families and people who live nearby.

A long-running project from the University of California, Berkeley, known as the CHAMACOS study is a key source of evidence. (The name is an acronym for the Center for the Health Assessment of Mothers and Children of Salinas, and means "little children" in Mexican Spanish.) Starting in 1999, researchers began following hundreds of Latino children—many from before they were even born—in Salinas, Calif., an area where much of U.S. produce is grown.

The findings show that pesticide exposure in pregnant women and during childhood is linked to poor reflexes in infants (a sign of brain and nervous system problems), lower IQ, attention disorders, poorer lung function, and more. People facing greater economic and social challenges are also more likely to suffer harm from pesticide exposure, says Brenda Eskenazi, PhD, the study's director.

"The effects of pesticides on the people who grow and harvest our food is a big part of the reason CR recommends buying organic when you can," says Charlotte Vallaeys, CR's senior policy analyst.

Pesticide Regulation

Laws governing the use of pesticides on produce in the U.S. are based, at least in theory, on a philosophy of avoiding potential risk in the absence of definitive proof of their harm. But CR's experts say the government hasn't upheld its responsibility to protect consumers.

The EPA, which is responsible for overseeing pesticides, sets limits on how much residue is allowed on food. The USDA and the Food and Drug Administration separately test fruits and vegetables for pesticides. Both agencies say that by and large, testing shows that levels are almost always below legal limits. But the research used to set these tolerances is imperfect, and they're often too high, says CR's Hansen.

At a baseline, the limits are set at one one-hundredth of the amount of a pesticide that doesn't cause apparent harm to animals in laboratory testing. That safety factor is meant to account for the uncertainty that arises when the results of animal studies are applied to long-term human exposure, and the fact that some people are more sensitive than others to pesticides.

The 1996 Food Quality Protection Act requires the EPA to apply extra protection when science doesn't conclusively show that a chemical is safe for infants and children. Known as the "FQPA safety factor," it lowers the cap on pesticide residue from one one-hundredth to one one-thousandth of the amount found not to harm lab animals. But with the exception of organophosphates, this safety margin has rarely been used.

A February 2020 analysis in the journal *Environmental Health* looked at 59 pesticide risk assessments from the EPA between 2011 and 2019. It found that the agency didn't apply the FQPA safety factor to more than 85 percent of nonorganophosphate pesticides.

The agency told CR it makes decisions about whether to apply the FQPA safety factor based on a variety of research, "a wealth of high-quality, peer-reviewed data." When it decides not to, it has determined that a particular pesticide doesn't affect infants and children any differently from adults.

But CR's scientists think that in many cases the EPA isn't looking at the entire spectrum of possible harm. The 1996 law instructs it to screen for endocrine-disrupting effects. But as of 2020, it has completed full endocrine screenings on only 52 pesticides.

Nor is it using the latest science, according to Hansen. "The tests the EPA uses to approve pesticides don't take into account new evidence on pesticide harms, and it hasn't incorporated many new scientific techniques," he says.

James Hewitt, an EPA spokesperson, says the agency's standard evaluations include some assessment of endocrine effects. And he says that while screening pesticides for endocrine-disruption potential is slow and resource intensive, the agency is working on developing newer, faster screening techniques, and that it refines its safety evaluation methods as science evolves.

What CR's Analysis Found

In our ratings, the “cleanest” produce receives an Excellent or Very Good score, while fruits and vegetables that carry the most risk are rated Fair or Poor. They factor in the total number of pesticides, the level of each on fruits and vegetables, the frequency with which they were detected, and their toxicity.

To account for toxicity, we used the EPA’s chronic reference dose for each pesticide (the amount it considers not likely to cause harm over a lifetime), then applied the FQPA safety factor to known neurological toxins or suspected endocrine disruptors—even when the EPA doesn’t. The goal was to “minimize the chance that risks are underestimated,” says Chuck Benbrook, PhD, a consultant who helped develop CR’s risk scores.

This means that fruits and vegetables with residue of many different pesticides can still receive a rating of Very Good or even Excellent if the amounts are low compared with the level we consider harmful, or if the pesticides have a low toxicity. But others rate poorly if they have even a very small amount of a more dangerous pesticide.

For example, fresh nonorganic tomatoes have a Very Good rating despite having residue of 65 pesticides because the amounts weren’t concerning and/or were found on only a few samples. On the other hand, imported nonorganic summer squash rated Poor because it had worrisome amounts of a particularly harmful pesticide on just one sample.

Thirty-one of 49 nonorganic fruits and vegetables—which include fresh, frozen, dried, and canned—earn a rating of Good or higher in domestic and/or imported forms.

But for the 18 nonorganic fruits and vegetables with a Fair or Poor rating, CR’s experts say everyone, especially pregnant women, infants, and young children, should try to eat the organic versions. If you can’t find them at a price you can afford, choose a higher-rated similar alternative, such as broccoli instead of green beans. Still, if that’s not possible, occasionally eating a low-rated fruit or vegetable doesn’t pose a serious health risk.

There were a few items for which organic produce got a score lower than Excellent. For those rated Very Good, the likely reason is that pesticides banned in organic farming drifted from fields where nonorganic crops were grown. But drift probably doesn’t account for the Fair or Poor scores for three organic items: imported frozen cherries, imported fresh snap peas, and U.S.-grown fresh spinach.

All but one of the contaminated frozen cherry samples were imported from Turkey. In recent years, questions have been raised about the integrity of the organic label on Turkish imports.

Organic imported snap peas are rated Fair because one of the 15 samples was contaminated with high levels of dimethoate, a potent neurotoxin.

And last, organic U.S.-grown spinach received a Poor score because 33 pesticides were found on 76 percent of the samples. For some of these, the levels were similar to nonorganic. That includes famoxadone, a pesticide banned in organic farming and a possible hormone disruptor.

“The vast majority of the USDA data show that while pesticides are sometimes found on organic foods, the levels are usually 10 percent or less of what’s found on nonorganic, which would be consistent with drift from a neighboring field,” CR’s Hansen says. “When levels on organic and nonorganic are similar, government agencies should take a closer look.”

A spokesperson for the USDA’s National Organic Program says fewer organic fruits and vegetables are tested than nonorganic, which may skew findings. And when it has questions about compliance, it first contacts the certifier for that operation, who can usually help identify underlying issues and quickly bring the farm or business back into compliance. When there’s indication of fraud or other serious problems, the program investigates and, when the evidence warrants, removes the offender from the organic system.

What Needs to Change

“Many federal policies should be altered to protect consumers from the harms of pesticides,” says Brian Ronholm, CR’s director of food policy. Particularly important is a system to quickly identify banned pesticides on imported produce to keep it out of the country. “The USDA must also take steps to maintain the integrity of the organic program and help farmers transition to organic, which will make organic options more widely available.”

In addition, CR says that government agencies and Congress should take the following steps:

- Ban the agricultural use of the riskiest pesticides. This falls under the EPA’s purview, although CR also supports legislation proposed in the U.S. House of Representatives and Senate known as the Protect America’s Children from Toxic Pesticides Act (PDF) of 2020. This bill would ban many of the pesticides that contributed the most to the risk from pesticides on fruits and vegetables in CR’s analysis. (It would also provide stronger protections for farm workers and communities at the greatest risk of pesticide exposure.)
- Apply the FQPA safety factor to all neurotoxins, suspected endocrine disruptors, and any pesticide for which there’s uncertainty about its safety. That’s already required under the Food Quality Protection Act. CR says the EPA needs to apply the law consistently.
- Provide the public with an easy-to-search database of the pesticides currently registered with the EPA, including information for each pesticide on whether the FQPA tenfold safety factor was applied when setting tolerance levels.
- Place an import alert on fruits and vegetables that test positive for banned pesticides, because pesticides that are banned in the U.S. sometimes appear on imported produce samples in the USDA’s Pesticide Data Program. To make this happen, the USDA should alert the FDA, the agency responsible for enacting and enforcing import alerts, when residues of a banned pesticide are detected in imported samples.

If you support reducing pesticides in our food, sign CR’s petition urging the EPA to ban the agricultural use of the riskiest pesticides and close loopholes that allow them to be used in the U.S.

Which Produce Should You Pick?

To create CR’s ratings, we analyzed five years of data—from 2014 to 2018, the latest available—from the USDA’s Pesticide Data Program, which tests fruits and vegetables for pesticides, about 24,000 samples in all. Then we calculated a rating based on four factors: the number of pesticides detected on each item, the frequency with which pesticides were found on samples, the average amount of residue of each pesticide found on the items, and the toxicity of the pesticides.

The ratings reflect the number of servings of a particular fruit or vegetable a person can eat per day over a lifetime before the pesticides pose potential harm. We based our risk analysis on the levels that could harm a 35-pound child, about the size of a 4-year-old. The serving sizes represent a child’s portion, about two-thirds of an adult serving. While adults may have more servings, the relative risk remains the same; that is, an item rated Poor carries a higher risk than one rated Fair or better. The risk comes from chronic exposure. Choosing produce with the best ratings most of the time can reduce the chance of future harm.

Get more information on CR’s pesticide ratings (PDF).

EPA Proposes to Extend ICR Regarding TSCA Section 8(a) Reporting and Recordkeeping Requirements for Certain Nanoscale Materials

Lynn L. Bergeson & Carla N. Hutton, Bergeson & Campbell Blog

<https://nanotech.lawbc.com/2020/08/epa-proposes-to-extend-icr-regarding-tsca-section-8a-reporting-and-recordkeeping-requirements-for-certain-nanoscale-materials/>

The U.S. Environmental Protection Agency (EPA) announced on August 27, 2020, that it submitted an information collection request (ICR), “Chemical-Specific Rules under the Toxic Substances Control Act Section 8(a); Certain Nanoscale Materials” to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act (PRA). 85 Fed. Reg. 52995. The ICR covers reporting and recordkeeping requirements for persons who manufacture or process chemical substances as nanoscale materials. Under Section 8(a) of the Toxic Substances Control Act (TSCA), EPA requires reporting and recordkeeping for certain chemical substances as nanoscale materials. Persons who manufacture or process these nanoscale materials must notify EPA of certain information, including production volume, methods of manufacture and processing, exposure and release information, and available health and safety information. EPA states that the reporting of these activities will provide it “with an opportunity to evaluate the information and consider appropriate action under TSCA to reduce any risk to human health or the environment.” EPA will use the reported information to inform its assessments of new chemical nanoscale materials submitted under TSCA Section 5. EPA proposes to extend the ICR, which is currently approved through August 31, 2020. Public comments were previously requested via the Federal Register on January 28, 2020, during a 60-day comment period. Comments are due September 28, 2020.

According to the notice, the entities potentially affected by this ICR are nanomaterial manufacturers and nanomaterial processors. EPA estimates that there will be 285 respondents per year and that the total estimated burden is 40,089 hours per year. EPA states that there is a decrease of 106,766 hours in the total estimated respondent burden compared with the ICR currently approved by OMB. According to EPA, the decrease reflects its expectation of decreased submissions. In the previous ICR period, the rule required an initial one-time reporting on current nanomaterials, while the reporting covered in this period requires only the reporting of new nanomaterials. EPA notes that furthermore, the burden estimates assume that the same manufacturers will report each year and, therefore, will have already undertaken rule familiarization in the previous ICR period. More information on EPA’s TSCA Section 8(a) rule is available in our January 12, 2017, memorandum, “EPA Promulgates Final TSCA Reporting and Recordkeeping Rule for Nanoscale Materials.”

EPA Threatens Public Health, Waiving Safety Review of Disinfectants To Be Used by American Airlines and Health Care Facilities; Need Questioned while More Uses Expected

Beyond Pesticides Blog

<https://beyondpesticides.org/dailynewsblog/2020/08/epa-threatens-public-health-waiving-safety-review-of-disinfectants-to-be-used-by-american-airlines-and-health-care-facilities-need-questioned-while-more-uses-expected/>

(Beyond Pesticides, August 28, 2020) The Environmental Protection Agency (EPA) has granted “emergency” permission to the State of Texas to allow the use of SurfaceWise®2, an unregistered pesticide, as an anti-viral surface coating. The compound can kill coronaviruses (including SARS-CoV-2) starting at two hours post application and for up to seven days, according to the manufacturer, Allied Bioscience. EPA has permitted this use via the authority of Section 18 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), which allows for “emergency” use of non-registered pesticides, typically to deal with extreme threats to agricultural activities. It is rarely used for public health emergencies. Beyond Pesticides recognizes the need for protection from transmission of the novel coronavirus, and maintains that it ought to and can be done without exposing people to toxic synthetic pesticides that have not undergone evaluation for safety. See Beyond Pesticides’ guidance on effective and safe precautions against the novel coronavirus.

The Texas Department of Agriculture secured the EPA exemption, making the state the first to do so; Allied BioScience is pursuing this emergency waiver across all 50 states. The exemption grants American Airlines and two health care facilities in the state the ability to use the unregistered pesticide, which is applied by electrostatic spraying. Usually, a Section 18 exemption would be made absent other viable alternatives to address the problem and when there are at least minimal health and environmental safety data available for the compound; neither is the case for SurfaceWise®2.

This one-year use allowance of the product would appear to be a specific exemption more than a response to a public health “emergency.” From the EPA website: “Section 18 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) authorizes EPA to exempt state and federal agencies from certain provisions of FIFRA and allow unregistered uses of pesticides to address emergency conditions. Under such an exemption, EPA allows limited use of a pesticide in defined geographic areas for a finite time, once EPA confirms that the situation meets that statutory definition of ‘emergency

condition.’ Section 18 emergency exemptions must be requested by a state or federal agency. Section 18 emergency exemptions are routinely granted for use in agricultural settings involving invasive pest outbreaks, though rarely for public health emergencies.”

EPA’s news release on the exemption says: “SurfaceWise2 is meant to inactivate viruses that land on a surface between regular cleanings. This product is not a replacement for routine cleaning and disinfection with products from EPA’s List N.” In the COVID-19 pandemic, EPA has created its “List N” — disinfectants that meet agency criteria for efficacy against SARS-CoV-2 (the virus that causes COVID-19) and other coronavirus illnesses, but which are not necessarily evaluated for safety. There are hundreds of compounds listed on List N, which begs the question: what is the “emergency need” for SurfaceWise®2?

Allied BioScience touts the compound as “non-toxic, non-irritating, odorless and contain[ing] no chemicals that produce harmful vapors or gases.” Yet, on EPA’s List N are a legion of products with active ingredients known as quaternary ammonium compounds or “quats,” about which there are toxicity concerns. In fact, roughly half of the List N products contain a quat as the single active ingredient. An active ingredient in SurfaceWise®2 is a quaternary ammonium.

Quats are organic, ionic chemical agents with properties of both surfactants and disinfectants; they have been used in disinfectant products for many years. However, especially over the course of the past decade or so, quats have been linked to a range of human health harms, including increased risks of asthma and allergic response; mutagenicity (e.g., some quats have been shown to damage DNA in human lymphocytes at much lower levels than are present in cleaning chemicals); contact dermatitis and other skin irritation; lowered fertility; and potential and significant disruption of key cellular processes (see more below). The National Institutes of Health designates quaternary ammonium as “asthma-causing and irritable to eyes and skin, flammable and corrosive, harmful to aquatic ecosystems, and persistent in the environment.”

There are also concerns about some quats’ ability to catalyze antibiotic resistance, and impacts on the human respiratory system — of particular concern in the era of COVID-19, which in many people damages lung tissue and compromises oxygen delivery to the body’s cells. The use of quats, which have been on the market since the early 20th century (before EPA began regulating potentially harmful chemicals) should be less facile — particularly during a massive public health pandemic.

University of California, Davis toxicologist Gino Cortopassi, PhD has studied causes of mitochondrial dysfunction for the past decade. Mitochondria are the “power plants” of cells, transforming food into the chemical energy needed for cellular biochemical processes — cellular respiration, or use of oxygen delivered by circulation, being a primary one. Cells use ATP (adenosine triphosphate) to store the energy that mitochondria produce. Dr. Cortopassi’s research has found that quats compromise both mitochondrial consumption of oxygen and the creation and storage of ATP. This finding should be a red alert for the use of quat compounds during the COVID-19 pandemic.

As Beyond Pesticides wrote in August 2020, “Individuals and government officials, alike, should observe all chemical ingredients on the disinfectant and sanitizer product labels and look at the use instructions to ensure that the method of use is safe. . . . Additionally, the U.S. Environmental Protection Agency (EPA) registers disinfectants as pesticides designed for use on hard surfaces, but not bare skin like sanitizers. It is essential that when EPA weighs risks and benefits of pesticide use, it does not allow harm to those disproportionately impacted by these chemicals like farm/landscape workers and people of color, who may suffer elevated exposure to the virus as essential workers. An evaluation of the contribution of pesticide use and exposure to health outcomes of COVID-19 is urgently needed.” For the facts on meeting health protection needs for disinfection, see Beyond Pesticides’ webpage on Disinfectants and Sanitizers.

Another, earlier iteration of this product, SurfaceWise, is registered as an anti-microbial surface coating, but SurfaceWise®2 is not currently on List N and has not been evaluated by EPA. The manufacturer has not submitted the necessary data to qualify for registration under FIFRA, but EPA notes: “Over the coming months, Allied BioScience will pursue a non-emergency approval under FIFRA Section 3 by submitting additional data to meet EPA’s registration requirements as an antiviral surface coating. If the full registration process is completed, the product would become available for purchase by members of the public.” This would potentially open the door to people using SurfaceWise®2

in their homes, subjecting themselves and their families to chronic and repeated exposures to a product that could make them more vulnerable were they to contract the novel coronavirus.

EPA's August 24 news release goes on, essentially, to invite more entities to apply for "emergency use" exemptions under Section 18. The news release mentions efficacy, but nowhere is there a word about safety: "EPA anticipates posting information for companies or individuals who are interested in pursuing a FIFRA Section 3 registration for antiviral surface coatings in the coming weeks. In the interim, states or federal agencies interested in pursuing a Section 18 Emergency Exemption Request for products that claim residual efficacy against viruses for up to seven days should be prepared to include efficacy data demonstrating that the product is durable and effective against viruses in their applications. Durability and efficacy should both be evaluated. For example, antiviral efficacy should be assessed using coated surfaces that have been exposed to physical touches/abrasion and treatment with disinfectants. EPA will review the results of these studies to ensure that surface coatings remain effective under the anticipated proposed conditions of use."

As the public and many, many businesses struggle to find ways to resume economic and other kinds of "normal" activities, there have been pushes both to resume potentially risky activities and to make some of those activities safer — or at least to make them seem safer. American Airlines' wish to deploy SurfaceWise®2 on its cabin surfaces can be seen as both. Airlines are facing economic hits from generally reduced air travel during the pandemic, and backlash due to images of airlines packing planes full. Many potential travelers, concerned about transmission of the novel coronavirus during flights, have opted not to fly. Yes, SurfaceWise®2 kills the virus. But this "emergency" exemption appears to some extent to be a solution in search of a problem.

In the initial stages of the pandemic, there was much concern about transmission via "fomites" — materials or objects that can transmit infection. Since then, nearly all of the emerging science has indicated that surfaces are very rarely responsible for transmission of the virus. The novel coronavirus is far more commonly transmitted via close personal contact when an infected person coughs, breathes, or speaks, according to the Centers for Disease Control and Prevention (CDC), than via contaminated surfaces.

Catching the virus while touching a surface would be "quite rare" but not "impossible," according to The Atlantic magazine. Donald Schaffner, PhD, a food-microbiology professor who studies disease contamination at Rutgers University, told the magazine, "You had clear airborne transmission with many, many opportunities for mass fomite transmission in the same place. But we just didn't see it. In the entire peer-reviewed covid-19 literature, I've found maybe one truly plausible report, in Singapore, of fomite transmission. And even there, it is not a slam-dunk case."

It is worth noting that one of the touted features of SurfaceWise®2 — its seven-day efficacy — also means that human exposures to it may not be brief or incidental, but could, in the case of a cross-country flight, for example, result in exposure of five or six hours' duration. Airline workers would also experience chronic exposures to the chemical, which Allied BioScience says "won't wipe off with repeated cleaning — even with harsh or abrasive chemicals." As The Washington Post reports, "Health and chemical experts say the cleanser [SurfaceWise®2] might actually harm passengers and flight attendants and do little to protect against the virus, which is mainly transmitted through the air in closed spaces."

A senior scientist at the Natural Resources Defense Council, Jennifer Sass, PhD, comments, "'It would be great if this was a miracle solution, but it's not. There's plenty of risk here and too much we don't know about how this chemical could actually harm people.'" The WaPo article continues: "[Dr.] Sass said the company's 'Material Safety Data Sheet,' which lists the common hazards of a product, acknowledged concern about prolonged skin and eye contact, both possible in environments such as the cabins of aircraft. The data sheet also does not list tests for chronic or long-term effects, she added. 'Although acute toxicity seems to be very low, many people will be exposed to it on a daily basis,' including airline workers."

Claudia S. Miller, MD, MS, an immunologist, allergist, and professor emeritus at the University of Texas, asserts in the WaPo article: "'People most vulnerable to the novel coronavirus — those with asthma, chemical intolerances or certain allergies — may have greater irritation from exposure to the disinfectant. . . . I'm very concerned when we're using

chemicals that may affect the more sensitive subset of the population. I don't like the idea of exposing people to disinfectants on top of this risk of having a virus infect their lungs.”

Dr. Miller also points out that, “When the coating is sprayed, it emits vapors that could be hazardous, creating risks especially for the workers who apply it. In a contained environment such as an airplane, those vapors could linger without ventilation.” Further, the product’s proposed label instructs those applying the chemical to use personal protective equipment, and to wear long pants, shoes, and socks, and American Airlines will provide to applicators gloves that are resistant to chemicals, as well as approved N95 or KN95 respirators. If the product is safe, why all these precautions? It is notable that neither the original SurfaceWise® nor this newer SurfaceWise®2 shows up in the database of EPA’s Safer Choice / Design for the Environment program, which purports to help “consumers, businesses, and purchasers find products that perform and contain ingredients that are safer for human health and the environment.”

American Airlines is pleased with the emergency exemption, which allows it to advertise that the company is “taking bold measures and using the latest products and technology to help ensure our customers’ well-being when they travel with us. . . . We look forward to also seeing SurfaceWise2 used in offices, schools, gymnasiums and other high-traffic areas to support the nation in safely reopening.” It intends to use SurfaceWise®2 on interior aircraft surfaces, and plans to use the product throughout its fleet, including those in its American Eagle regional partners.

Beyond Pesticides believes that this EPA emergency use exemption, and any that might follow in response to applications from other localities for use of SurfaceWise®2, should be subject to the public comment process required by FIFRA. Federal regulations (§166.24: Public notice of receipt of application and opportunity for public comment) require that, “The Administrator shall issue a notice of receipt in the Federal Register for a specific, quarantine, or public health exemption and request public comment when any one of the following criteria is met:” — which list of criteria includes “a complete application for registration of that use and/or a petition for tolerance for residues in or on the commodity has not been submitted to the Agency.”

That said, because SurfaceWise®2 contains the active ingredient 1-octadecanaminium,N,N-dimethyl-N[3-(trihydroxysilyl)propyl],chloride, which has been used in other registered compounds, EPA might not consider it a new active ingredient — in which case, the agency might argue the public notice and comment requirements does not apply. However, even new uses of active ingredients already registered by EPA must, by law, be subject to review because of new exposure patterns and an assessment of cumulative risk.

Way back in 2002, Beyond Pesticides wrote about this “emergency” loophole in the regulation of toxic pesticides, saying: “Section 18 emergency exemptions provide a loophole by which pesticides are used without the scrutiny provided in the registration process. Through declarations of emergencies and crises, states allow use of pesticides which for several reasons (including lack of a sustainable market due to rapid development of resistance, data gaps, or EPA’s concern about certain risks) cannot be registered for additional uses. EPA has said that pesticides with data gaps will not be allowed to expand their use patterns, but this restriction does not apply to emergency exemptions and special local needs registration.”

Everyone feels beleaguered by this pandemic and its outfalls, and wishes life could return to something nearer “normal.” Yet people’s understandable yearnings for “normal” ought not be exploited by industry or government, particularly to introduce “fixes” that may actually mitigate against human health and well-being. With this emergency exemption, EPA and industry are conducting a dangerous kind of legerdemain: distracting from scientifically supported transmission scenarios with a “solution” for one that barely exists — the vanishingly small possibility that COVID-19 could be spread by contact with contaminated surfaces. Tragically, EPA is doing exactly this and allowing unnecessary exposures to a toxic pesticide in the process.

Beyond Pesticides maintains that during public health emergencies involving infectious diseases, such as the current coronavirus pandemic, it is critical to scrutinize practices and products very carefully so that risks presented by the crisis are not exacerbated by unnecessary threats from toxic products promoted as protective. Again, consult Beyond Pesticides fact sheet on safe protections.

Sources:

https://www.washingtonpost.com/travel/2020/08/25/american-will-be-first-airline-use-coating-that-kills-coronavirus-up-seven-days/?utm_campaign=wp_main&utm_medium=social&utm_source=facebook,
<https://www.epa.gov/newsreleases/trump-epa-approves-first-ever-long-lasting-antiviral-product-use-against-covid-19>,
and

<https://www.washingtonpost.com/climate-environment/2020/08/26/epa-coronavirus-cleaner/>

All unattributed positions and opinions in this piece are those of Beyond Pesticides.

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For more news, visit:

- Inside EPA: <https://insideepa.com/>
- Inside TSCA: <https://insideepa.com/inside-tsca-home>
- Bloomberg Environment and Energy: <https://news.bloombergenvironment.com/environment-and-energy/>

If you'd like to be removed or would like to add someone to the listserv please contact Bailey Rosen at Rosen.Bailey@epa.gov. Feedback and interesting articles are welcomed. Thanks and enjoy!

And while you're reading.... Remember to shoot your coworkers [a shooting star!](#)

Appointment

From: Keigwin, Richard [Keigwin.Richard@epa.gov]
Sent: 5/8/2019 9:30:42 PM
To: Keigwin, Richard [Keigwin.Richard@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Smith, Charles [Smith.Charles@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]; Wilbur, Donald [Wilbur.Donald@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Anderson, Brian [Anderson.Brian@epa.gov]; Nesci, Kimberly [Nesci.Kimberly@epa.gov]; Costello, Kevin [Costello.Kevin@epa.gov]; Mannix, Marianne [Mannix.Marianne@epa.gov]; Appleyard, Moana [Appleyard.Moana@epa.gov]; Sherman, Kelly [Sherman.Kelly@epa.gov]; Friedman, Dana [Friedman.Dana@epa.gov]; Nguyen, Khue [Nguyen.Khue@epa.gov]; Britton, Cathryn [Britton.Cathryn@epa.gov]
CC: Anderson, Neil [Anderson.Neil@epa.gov]; Kiely, Timothy [Kiely.Timothy@epa.gov]; Kaul, Monisha [Kaul.Monisha@epa.gov]; Cook, Colwell [cook.colwell@epa.gov]; Berwald, Derek [Berwald.Derek@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Matuszko, Jan [Matuszko.Jan@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; Rickard, Kristin [Rickard.Kristin@epa.gov]; Metzger, Michael [Metzger.Michael@epa.gov]

Subject:

Ex. 6 Personal Privacy (PP)

Attachments:

Location: ****PY-4370/80****

Start: 5/20/2019 1:30:00 PM

End: 5/20/2019 2:30:00 PM

Show Time As: Busy

Importance: High

Ex. 6 Personal Privacy (PP)

From: Mannix, Marianne

Sent: Wednesday, May 8, 2019 11:51 AM

To: McKamey, Ann <McKamey.Ann@epa.gov>

Cc: Sherman, Kelly <Sherman.Kelly@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Nguyen, Khue <Nguyen.Khue@epa.gov>; Appleyard, Moana <Appleyard.Moana@epa.gov>

Subject: **Ex. 6 Personal Privacy (PP)**

Hi Ann,

Is Rick available the week of May 20th or 27th for a briefing on the status and path forward for pyrethroids registration review?

Invitees should include members of the PRD, HED, EFED, and BEAD IO's along with myself, Moana Appleyard, Kelly Sherman, Cathryn Britton, Dana Friedman, and Khue Nguyen.

Thank you!

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

Appointment

From: Dunn, Alexandra [dunn.alexandra@epa.gov]
Sent: 11/26/2019 3:37:52 PM
To: Dunn, Alexandra [dunn.alexandra@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Smith, Charles [Smith.Charles@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]; Sherman, Kelly [Sherman.Kelly@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; Tan, Cecilia [Tan.Cecilia@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Craig, Evisabel [Craig.Evisabel@epa.gov]; Metzger, Michael [Metzger.Michael@epa.gov]; VanAlstine, Julie [VanAlstine.Julie@epa.gov]; Olinger, Christine [Olinger.Christine@epa.gov]; Myers, Tom [Myers.Tom@epa.gov]; Rickard, Kristin [Rickard.Kristin@epa.gov]; Perron, Monique [Perron.Monique@epa.gov]; Jakob, Avivah [Jakob.Avivah@epa.gov]; Smith, Carolyn [smith.carolyn@epa.gov]; Evans, Elizabeth [Evans.Elizabeth@epa.gov]; Bennett, Isabella [Bennett.Isabella@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Mosby, Jackie [Mosby.Jackie@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]; Mills, William T. [mills.williamt@epa.gov]
CC: Wilbur, Donald [Wilbur.Donald@epa.gov]; Dawson, Jeffrey [Dawson.Jeff@epa.gov]; Fischer, David [Fischer.David@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]
Subject: Pyrethroids - PBPK Model Applicability
Attachments: Pyrethroid briefing for Alex Dunn-final for IO- dec 3 2019.pptx .pptx
Location: 3156 WJC EAST (Call in number 1 (202) 991-0477, access code 3093396)
Start: 12/3/2019 7:00:00 PM
End: 12/3/2019 8:00:00 PM
Show Time As: Busy

To brief the OCSPP-IO on the applicability of pyrethroid PBPK data on the entire class of pyrethroids, which includes the FQPA safety factor decision that applies to all pyrethroids, as well as the newer determination that the PBPK model is only appropriate for determining toxicity Points of Departure for the pyrethroids on which the modeling was conducted, not applied across the entire class of pyrethroids.



Pyrethroid briefing
for Alex Dunn-fin...

Message

From: Fischer, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F81D43BD8EEE462399C4F1E689E28658-FISCHER, DA]
Sent: 11/27/2019 11:02:25 PM
To: Vogel, Dana [Vogel.Dana@epa.gov]
CC: Lowit, Anna [Lowit.Anna@epa.gov]
Subject: RE: Pyrethroid Briefing slides for OCSPP IO
Attachments: Pyrethroid briefing for Alex Dunn-final- dec 3 2019.pptx with DF comments.pptx

Thanks, a few comments from a quick review of the slides. Happy Thanksgiving.

David

David B. Fischer, M.P.H., J.D.
Deputy Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2665

From: Vogel, Dana <Vogel.Dana@epa.gov>
Sent: Tuesday, November 26, 2019 4:28 PM
To: Fischer, David <Fischer.David@epa.gov>
Cc: Lowit, Anna <Lowit.Anna@epa.gov>
Subject: FW: Pyrethroid Briefing slides for OCSPP IO

Hi David,

As a followup to our call this am, I am forwarding you our proposed slides for the pyrethroid briefing for Alex that is scheduled for next week. Please let us know if you have any suggestions. I will also forward you the white papers we have written related to the pyrethroids. One of the papers is the FQPA paper that is already out for comment and the other is an internal paper that describes the current limitations of the pyrethroid PBPK modelling.

Thanks again and let us know your feedback,
Dana

From: Craig, Evisabel <Craig.Evisabel@epa.gov>
Sent: Tuesday, November 26, 2019 4:14 PM
To: Lowit, Anna <Lowit.Anna@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>
Cc: Tan, Cecilia <Tan.Cecilia@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Sherman, Kelly <Sherman.Kelly@epa.gov>; VanAlstine, Julie <VanAlstine.Julie@epa.gov>; Swartz, Christina <Swartz.Christina@epa.gov>
Subject: Pyrethroid Briefing slides for OCSPP IO

Dana,

As discussed, attached are the pyrethroid briefing slides for you to send to David Fischer.

Thank you,
Evisabel

Message

From: Sherman, Kelly [Sherman.Kelly@epa.gov]
Sent: 1/4/2021 5:48:36 PM
To: Goodis, Michael [Goodis.Michael@epa.gov]; Kiely, Timothy [Kiely.Timothy@epa.gov]; OPP PRD Managers [OPP_PRD_Managers@epa.gov]
CC: Pinto, Ana [Pinto.Ana@epa.gov]; Mannix, Marianne [Mannix.Marianne@epa.gov]; Jakob, Avivah [Jakob.Avivah@epa.gov]
Subject: RE: Reg Review Slide
Attachments: OPs Overview 1.4.21.pptx

Hi Mike,

Here is what we pulled together for the OPs. We had already put it in a slide, in case that is helpful (attached). As you probably know, much of the plan for OPs is still up in the air, and will be determined in the coming months after HED has had time to digest the SAP report, and once we have briefed the OPP IO and the incoming OCSPP IO.

Please let us know if this will work, or if you'd like us to make any adjustments.

~~~~~

Organophosphates (OPs)

# Ex. 5 Deliberative Process (DP)

Thanks,  
Kelly

Kelly Sherman  
Chief, Risk Management and Implementation Branch III (RMIB III)  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-8401

---

**From:** Goodis, Michael <Goodis.Michael@epa.gov>  
**Sent:** Monday, January 04, 2021 10:59 AM  
**To:** Sherman, Kelly <Sherman.Kelly@epa.gov>; Britton, Cathryn <Britton.Cathryn@epa.gov>; Kiely, Timothy <Kiely.Timothy@epa.gov>; OPP PRD Managers <OPP\_PRD\_Managers@epa.gov>  
**Cc:** Biscoe, Melanie <Biscoe.Melanie@epa.gov>  
**Subject:** RE: Reg Review Slide

Thanks everyone – high level detail – only one slide for each please.  
You can just send me the bullets and I can add to my slide set – thanks!

Michael L. Goodis, P.E.  
Acting Deputy Director for Programs  
Office of Pesticide Programs  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, D.C.  
571-309-5497 (cell)

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**From:** Sherman, Kelly <[Sherman.Kelly@epa.gov](mailto:Sherman.Kelly@epa.gov)>  
**Sent:** Monday, January 04, 2021 10:44 AM  
**To:** Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto:Britton.Cathryn@epa.gov)>; Kiely, Timothy <[Kiely.Timothy@epa.gov](mailto:Kiely.Timothy@epa.gov)>; OPP PRD Managers <[OPP\\_PRD\\_Managers@epa.gov](mailto:OPP_PRD_Managers@epa.gov)>  
**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Biscoe, Melanie <[Biscoe.Melanie@epa.gov](mailto:Biscoe.Melanie@epa.gov)>  
**Subject:** RE: Reg Review Slide

Cathryn - I don't have it, but the text from the slide is in Mike's email message below.

Mike – So that we know what level of detail to provide -- Do you want a single slide for each, or can it be a few slides?

Kelly Sherman  
Chief, Risk Management and Implementation Branch III (RMIB III)  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-8401

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**From:** Britton, Cathryn <[Britton.Cathryn@epa.gov](mailto:Britton.Cathryn@epa.gov)>  
**Sent:** Monday, January 04, 2021 10:41 AM  
**To:** Kiely, Timothy <[Kiely.Timothy@epa.gov](mailto:Kiely.Timothy@epa.gov)>; OPP PRD Managers <[OPP\\_PRD\\_Managers@epa.gov](mailto:OPP_PRD_Managers@epa.gov)>  
**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>; Biscoe, Melanie <[Biscoe.Melanie@epa.gov](mailto:Biscoe.Melanie@epa.gov)>  
**Subject:** RE: Reg Review Slide

Can someone send a copy of the slide that Mike currently has so we can add to it?

Thanks,  
Cathryn

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**From:** Kiely, Timothy <[Kiely.Timothy@epa.gov](mailto:Kiely.Timothy@epa.gov)>  
**Sent:** Monday, January 04, 2021 9:57 AM  
**To:** OPP PRD Managers <[OPP\\_PRD\\_Managers@epa.gov](mailto:OPP_PRD_Managers@epa.gov)>  
**Cc:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>  
**Subject:** FW: Reg Review Slide  
**Importance:** High

Good morning. Please see the forwarded message from Mike (copied). He is asking for some information for his presentation to the cotton folks tomorrow. I pulled the following on the pyrethroids from the FY20 Q4 fact sheets. Is it possible to flush out the mitigation a bit (maybe a list)? What a/s do not have IDs?

Also, are there a couple of bullets for the OPs we can send Mike? He needs this today

Tim

## Ex. 5 Deliberative Process (DP)

### Human Health Risks and Mitigation

## Ex. 5 Deliberative Process (DP)

### Ecological Risks and Mitigation

## Ex. 5 Deliberative Process (DP)

### STAKEHOLDER RESPONSE

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

## COMMUNICATIONS

- An OPP update, press release, and web updates are proposed for release of the pyrethroids IDs.

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**From:** Goodis, Michael <[Goodis.Michael@epa.gov](mailto:Goodis.Michael@epa.gov)>

**Sent:** Monday, January 04, 2021 9:04 AM

**To:** Reaves, Elissa <[Reaves.Elissa@epa.gov](mailto:Reaves.Elissa@epa.gov)>; Kiely, Timothy <[Kiely.Timothy@epa.gov](mailto:Kiely.Timothy@epa.gov)>

**Subject:** Reg Review Slide

Elissa/Tim

I have a talk tomorrow at a cotton conference and chatted with Don Parker about topics to cover. He also brought up reg review status of OPs and pyrethroids.

The only recent slide on pyrethroids I have is below. Are there any additional points that can be made? Don mentioned something about veg buffer strips so maybe something to say about that.

Also I could not find a recent slide on OPs – overall status and risk issues.

I am fine working with the respective BC/TL on these to come up with some bullets. Sorry – but this came up late.

Pyrethroids

## Ex. 5 Deliberative Process (DP)

Michael L. Goodis, P.E.

Acting Deputy Director for Programs

Office of Pesticide Programs

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

Washington, D.C.

571-309-5497 (cell)

Message

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**From:** Han, Kaythi [Han.Kaythi@epa.gov]  
**Sent:** 8/9/2019 7:39:11 PM  
**To:** Dunn, Alexandra [dunn.alexandra@epa.gov]  
**CC:** Fischer, David [Fischer.David@epa.gov]; Kadeli, Lek [Kadeli.Lek@epa.gov]; Altieri, Sonia [Altieri.Sonia@epa.gov]; Daguiard, Robert [Daguiard.Robert@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]  
**Subject:** RE: Let's get ready to respond to this....I may get an inquiry ASAP

OK. Will share with OPA.

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Friday, August 09, 2019 3:25 PM  
**To:** Han, Kaythi <Han.Kaythi@epa.gov>  
**Cc:** Fischer, David <Fischer.David@epa.gov>; Kadeli, Lek <Kadeli.Lek@epa.gov>; Altieri, Sonia <Altieri.Sonia@epa.gov>; Daguiard, Robert <Daguiard.Robert@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>  
**Subject:** Re: Let's get ready to respond to this....I may get an inquiry ASAP

It's good. The first point is best one

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety & Pollution Prevention  
U.S. Environmental Protection Agency  
Washington, DC

Sent from my iPhone

On Aug 9, 2019, at 3:13 PM, Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)> wrote:

Hi Alex,

Here are the discussion points on the article. The SMEs and Ed have reviewed and approved them. Do you have other points to add before I share them with Nancy?

**Discussion points in response to Bloomberg article "*EPA Shrinks Children's Safety Margin for Class of Pesticides*"**

## Ex. 5 Deliberative Process (DP)

- # Ex. 5 Deliberative Process (DP)
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Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Han, Kaythi  
**Sent:** Wednesday, August 07, 2019 5:15 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>  
**Cc:** Fischer, David <[Fischer.David@epa.gov](mailto:Fischer.David@epa.gov)>; Kadeli, Lek <[Kadeli.Lek@epa.gov](mailto:Kadeli.Lek@epa.gov)>; Altieri, Sonia <[Altieri.Sonia@epa.gov](mailto:Altieri.Sonia@epa.gov)>; Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>  
**Subject:** RE: Let's get ready to respond to this....I may get an inquiry ASAP

Following up on this-- Nancy asked for some discussion points on what we would want to correct, so I'll work with OPP to finesse the article review they sent yesterday. Nancy was open to a few different options for engaging with BNA, but I think she'll have a better idea on the most appropriate option after seeing our discussion points.

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Han, Kaythi  
**Sent:** Monday, August 05, 2019 5:59 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>; Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>  
**Cc:** Fischer, David <[Fischer.David@epa.gov](mailto:Fischer.David@epa.gov)>; Kadeli, Lek <[Kadeli.Lek@epa.gov](mailto:Kadeli.Lek@epa.gov)>; Altieri, Sonia <[Altieri.Sonia@epa.gov](mailto:Altieri.Sonia@epa.gov)>  
**Subject:** RE: Let's get ready to respond to this....I may get an inquiry ASAP

I can do that. I spoke to Greg and he'll work on pulling some specific points from the article. I'll share that with you before using it as a basis for my discussion with OPA.



Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

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**From:** Dunn, Alexandra  
**Sent:** Monday, August 05, 2019 5:12 PM  
**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>; Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>  
**Cc:** Fischer, David <[Fischer.David@epa.gov](mailto:Fischer.David@epa.gov)>; Kadeli, Lek <[Kadeli.Lek@epa.gov](mailto:Kadeli.Lek@epa.gov)>; Altieri, Sonia <[Altieri.Sonia@epa.gov](mailto:Altieri.Sonia@epa.gov)>  
**Subject:** RE: Let's get ready to respond to this....I may get an inquiry ASAP

Talk to OPA on how to work on this. I think the program would have more to say about this issue. It's a lengthy paper on this; we need to be careful on children's health issues.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

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**From:** Dunn, Alexandra  
**Sent:** Monday, August 5, 2019 5:08 PM  
**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Cc:** Fischer, David <[Fischer.David@epa.gov](mailto:Fischer.David@epa.gov)>; Kadeli, Lek <[Kadeli.Lek@epa.gov](mailto:Kadeli.Lek@epa.gov)>; Altieri, Sonia <[Altieri.Sonia@epa.gov](mailto:Altieri.Sonia@epa.gov)>  
**Subject:** RE: Let's get ready to respond to this....I may get an inquiry ASAP

I think it isn't accurate? Maybe we need to do a correcting the record? I don't like the headline.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

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**From:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>  
**Sent:** Monday, August 5, 2019 4:31 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Cc:** Fischer, David <[Fischer.David@epa.gov](mailto:Fischer.David@epa.gov)>; Kadeli, Lek <[Kadeli.Lek@epa.gov](mailto:Kadeli.Lek@epa.gov)>; Altieri, Sonia <[Altieri.Sonia@epa.gov](mailto:Altieri.Sonia@epa.gov)>  
**Subject:** RE: Let's get ready to respond to this....I may get an inquiry ASAP

We haven't penned one in a while, but would you be interested in having the program prepare a letter to the editor? Or should the program do something a little more low key like preparing backpocket questions in case of further press inquiries?

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

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**From:** Dunn, Alexandra  
**Sent:** Monday, August 05, 2019 4:14 PM  
**To:** Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>  
**Cc:** Keigwin, Richard <[Keigwin.Richard@epa.gov](mailto:Keigwin.Richard@epa.gov)>; Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>; Fischer, David <[Fischer.David@epa.gov](mailto:Fischer.David@epa.gov)>; Kadeli, Lek <[Kadeli.Lek@epa.gov](mailto:Kadeli.Lek@epa.gov)>  
**Subject:** Let's get ready to respond to this....I may get an inquiry ASAP

News

## EPA Shrinks Childrens' Safety Margin for Class of Pesticides

Posted Aug. 2, 2019, 5:52 PM  
By Adam Allington

- Pyrethroids are common agricultural and household insecticides
- EPA says new data shows no need for extra protective factor for children

The Environmental Protection Agency is removing childrens' protections from a common class of pesticides because it says they are no longer warranted.

The change means the agency believes that risk standards set for adults for the pyrethroid class of pesticides are protective of kids.

Pyrethroids are the synthetic versions of pyrethrin insecticides, which are naturally derived from chrysanthemum flowers.

"Based on a thorough review of recent data, EPA concluded that there are reliable data to support reducing the current threefold (3X) Food Quality Protection Act (FQPA) safety factor for pyrethroids to 1X (one fold), and that margin will be safe for infants and children," EPA said in a press release.

The safety factors are used under that pesticide law when calculating risk standards, which translate into "tolerances," or the amounts that can be applied and allowed as residues on food.

Pyrethrins are found in over 3,500 registered pesticide products, many of which have common home garden or crop applications. They're also used on pets as flea and tick treatments.

Pyrethroids are used on ornamental plants, to control mosquitoes, and on fruit and nut crops including apple, pear, almond and citrus.

The 1996 FQPA requires EPA to apply up to an additional tenfold safety factor when setting or reassessing allowable pesticide residues for vulnerable populations such as children—unless adequate data are available to support a different factor. Even when invoked, the agency can later remove the safety factor when data indicate children need no special protections.

### New Conclusion

The agency now says its new evaluation of studies—as well as data generated by the industry-backed Council for the Advancement of Pyrethroid Human Risk Assessment—shows that adult standards will protect children.

The council is supported by Bayer CropScience, Syngenta, and Valent BioSciences LLC, among other companies.

“The Agency concluded that the FQPA safety factor for pyrethroids should be reduced to 1X for all populations because the data indicate that there is no increased sensitivity, or in other words, there are no pharmacokinetic differences between adults and children,” the agency said.

The public won’t know what the exact acceptable dose level is until EPA makes human health risk documents for pyrethroids available later this year.

## **Causes for Potential Concern**

Pyrethrins act on the nervous system of insects that touch or eat it and are often mixed with another chemical to increase their impact. The fact that these are “naturally occurring” chemicals does not diminish their toxicity, scientists say.

“Cyanide is a natural chemical. Plenty of exceedingly toxic things come from natural products,” said Tina Levine, a former director of EPA’s Health Effects Division in the Office of Pesticide Programs. She served under both Republican and Democratic administrations before retiring in 2011.

In 2010 Levine said the agency felt there was sufficient reason to keep a threefold layer of protection for children from pyrethroids.

“Unless this new study shows there is no difference [between adults and children], I would be suspicious,” she said.

“By doing this EPA is sort of discounting some of that other evidence in humans,” said Alexis Temkin, a toxicologist at the Environmental Working Group, a Washington, D.C.-based health watchdog.

“When there is some evidence from human studies that links to harm in the developing brain, then I think there is really no reason to reduce the safety factor,” she said.

To contact the reporter on this story: Adam Allington in Washington at [aallington@bloombergenvironment.com](mailto:aallington@bloombergenvironment.com)

To contact the editors responsible for this story: Gregory Henderson at [ghenderson@bloombergenvironment.com](mailto:ghenderson@bloombergenvironment.com); Steven Gibb at [sgibb@bloombergenvironment.com](mailto:sgibb@bloombergenvironment.com)

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

Message

---

**From:** Lowit, Anna [Lowit.Anna@epa.gov]  
**Sent:** 11/26/2019 9:43:31 PM  
**To:** Keigwin, Richard [Keigwin.Richard@epa.gov]  
**Subject:** Fwd: Pyrethroid Briefing slides for OCSPP IO  
**Attachments:** Pyrethroid briefing for Alex Dunn-final- dec 3 2019.pptx; ATT00001.htm

FYI

We talked to him today and made some significant changes to the slides

Sent from my iPhone

Begin forwarded message:

**From:** "Vogel, Dana" <Vogel.Dana@epa.gov>  
**Date:** November 26, 2019 at 4:27:45 PM EST  
**To:** "Fischer, David" <Fischer.David@epa.gov>  
**Cc:** "Lowit, Anna" <Lowit.Anna@epa.gov>  
**Subject:** FW: Pyrethroid Briefing slides for OCSPP IO

Hi David,

As a followup to our call this am, I am forwarding you our proposed slides for the pyrethroid briefing for Alex that is scheduled for next week. Please let us know if you have any suggestions. I will also forward you the white papers we have written related to the pyrethroids. One of the papers is the FQPA paper that is already out for comment and the other is an internal paper that describes the current limitations of the pyrethroid PBPK modelling.

Thanks again and let us know your feedback,  
Dana

---

**From:** Craig, Evisabel <Craig.Evisabel@epa.gov>  
**Sent:** Tuesday, November 26, 2019 4:14 PM  
**To:** Lowit, Anna <Lowit.Anna@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>  
**Cc:** Tan, Cecilia <Tan.Cecilia@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Sherman, Kelly <Sherman.Kelly@epa.gov>; VanAlstine, Julie <VanAlstine.Julie@epa.gov>; Swartz, Christina <Swartz.Christina@epa.gov>  
**Subject:** Pyrethroid Briefing slides for OCSPP IO

Dana,

As discussed, attached are the pyrethroid briefing slides for you to send to David Fischer.

Thank you,  
Evisabel

Message

---

**From:** Dinkins, Darlene [Dinkins.Darlene@epa.gov]  
**Sent:** 7/26/2019 2:48:06 PM  
**To:** Han, Kaythi [Han.Kaythi@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]  
**CC:** Messina, Edward [Messina.Edward@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Sisco, Debby [Sisco.Debby@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Bennett, Isabella [Bennett.Isabella@epa.gov]; Daguillard, Robert [Daguillard.Robert@epa.gov]  
**Subject:** FW: Pyrethroids FQPA Safety Factor Communications Package  
**Attachments:** Pyrethroids FQPA Safety Factor Document Page.ah\_EC\_ks .docx; Pyrethroids Overview Webpage Update.docx; Pyrethroids FQPA tweet.docx; Pyrethroids Data Requirements Webpage Update.docx; Pyrethroids FQPA Safety Factor Document Page.ah\_EC\_ks .docx; Pyrethroids Data Requirements Webpage Update.docx; 1 pager updating management on status of fda epa jurisdictional realignment discussions for nb (005) 07 12 2019.docx

Good morning Kaythi and Cheryl,

Please find attached the comms materials on the reduction of the FQPA safety factor from (3X) to 1X for pyrethroids. OGC has cleared these materials. PRD would like to announce the availability of the white paper as soon as possible because they need to communicate with registrants prior to drafting the PIDs, and they cannot begin those conversations before the document is publicly available.

The communications package includes:

- OPP Update
- Tweet
- Update to the pyrethroids overview webpage
- Update to the pyrethroids data requirements webpage
- A new document page to house the FQPA white paper (this webpage can be removed from the website once the white paper is uploaded to the docket later this year)

*Darlene Dinkins*

Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-5214

Message

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**From:** Dinkins, Darlene [Dinkins.Darlene@epa.gov]  
**Sent:** 7/24/2019 10:43:49 PM  
**To:** Keigwin, Richard [Keigwin.Richard@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]  
**Subject:** FW: Pyrethroids FQPA Safety Factor Communications Package  
**Attachments:** Pyrethroids FQPA Safety Factor Document Page.ah\_EC\_ks .docx; Pyrethroids Overview Webpage Update.docx; Pyrethroids FQPA tweet.docx; 1 pager updating management on status of fda epa jurisdictional realignment discussions for nb (005) 07 12 2019.docx; Pyrethroids Data Requirements Webpage Update.docx; Pyrethroids FQPA Safety Factor Document Page.ah\_EC\_ks .docx; Pyrethroids Data Requirements Webpage Update.docx

Here are the comms materials on the reduction of the FQPA safety factor from (3X) to 1X for pyrethroids. CSB worked with Elissa Reaves, Kelly Sherman, Evisabel Craig and OGC. This includes:

- -New Web intro on the “2019 Evaluation of the FQPA Safety Factor for Pyrethroids”
- -Updates to the Pyrethrins and Pyrethroids Webpage
- -1 Twitter message
- -OPP Update (titled “1-pager updating management on the status....”)
- -Updates to the Pyrethroids and Pyrethrins Data Requirements Webpage

*Darlene Dinkins*

Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-5214

---

**From:** Siedschlag, Gregory  
**Sent:** Thursday, July 18, 2019 4:42 PM  
**To:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>  
**Cc:** Bennett, Isabella <Bennett.Isabella@epa.gov>; Naimy, Nina <Naimy.Nina@epa.gov>  
**Subject:** FW: Pyrethroids FQPA Safety Factor Communications Package

Hi Darlene,

We got some input on OGC on the attachments, as well as Elissa Reaves, Kelly Sherman, and Evisabel Craig. They are ready for OPP IO review.

Thanks,

**Greg Siedschlag**  
Chief, Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 255-0284  
<https://www.epa.gov/pesticides>

---

**From:** Bennett, Isabella  
**Sent:** Wednesday, July 17, 2019 4:59 PM  
**To:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Cc:** St. Fleur, Marilyn <StFleur.Marilyn@epa.gov>  
**Subject:** RE: Pyrethroids FQPA Safety Factor Communications Package

OGC had some edits that I accepted and comments that PRD addressed. Would you like to review before sending to Debby?

Thanks,  
Isabella

---

**From:** Siedschlag, Gregory  
**Sent:** Tuesday, July 09, 2019 5:31 PM  
**To:** Bennett, Isabella <Bennett.Isabella@epa.gov>  
**Cc:** St. Fleur, Marilyn <StFleur.Marilyn@epa.gov>  
**Subject:** RE: Pyrethroids FQPA Safety Factor Communications Package

Let's have OGC take a look. Once they review we can send to Debby, hopefully on Thursday.

Thanks,

**Greg Siedschlag**  
Chief, Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 255-0284  
<https://www.epa.gov/pesticides>

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**From:** Bennett, Isabella  
**Sent:** Tuesday, July 09, 2019 9:52 AM  
**To:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Cc:** St. Fleur, Marilyn <StFleur.Marilyn@epa.gov>  
**Subject:** Pyrethroids FQPA Safety Factor Communications Package  
**Importance:** High

Hi Greg,

The communications for the pyrethroids FQPA safety factor are ready for your review. PRD is eager to announce the availability of the paper ASAP. They are hoping for **July 18<sup>th</sup>** at the latest. They need to communicate with registrants prior to drafting the PIDs, and they cannot begin those conversations before the document is publicly available.

The communications package includes:

- OPP Update
- Tweet
- Update to the pyrethroids overview webpage
- Update to the pyrethroids data requirements webpage
- A new document page to house the FQPA white paper (this webpage can be removed from the website once the white paper is uploaded to the docket later this year)

Approved by Elissa Reaves, Kelly Sherman, and Evisabel Craig.

Thanks for your review!  
Isabella

*Isabella Bennett*

Communication Services Branch  
Field and External Affairs Division  
Office of Pesticide Programs

Mobile: 703-213-7143

Desk:703-347-0415



Message

---

**From:** Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]  
**Sent:** 11/8/2019 9:17:39 PM  
**To:** Han, Kaythi [Han.Kaythi@epa.gov]  
**CC:** Evans, Elizabeth [Evans.Elizabeth@epa.gov]; Bennett, Isabella [Bennett.Isabella@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]  
**Subject:** FW: Combined CAS and OCHP with OPP comments on edits  
**Attachments:** pyrethroids desk statement combo edits.docx

Hi Kaythi,

Per our discussion earlier, here are the edits to what was sent by OCHP. Like Rick mentioned before, it may be helpful for him to have a convo with CarolAnn about why the FQPA white paper is not a "proposal."

Thanks,

**Greg Siedschlag**  
Chief, Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 319-7949  
<https://www.epa.gov/pesticides>

---

**From:** Han, Kaythi <Han.Kaythi@epa.gov>  
**Sent:** Friday, November 08, 2019 1:50 PM  
**To:** Evans, Elizabeth <Evans.Elizabeth@epa.gov>; Bennett, Isabella <Bennett.Isabella@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Subject:** RE: Combined CAS and OCHP with OPP comments on edits

Thanks, Liz.

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Evans, Elizabeth <Evans.Elizabeth@epa.gov>  
**Sent:** Friday, November 08, 2019 1:45 PM  
**To:** Bennett, Isabella <Bennett.Isabella@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Subject:** Combined CAS and OCHP with OPP comments on edits  
**Importance:** High

Elizabeth E. Evans  
Acting Team Lead, Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: (703) 305-7891

Message

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**From:** Wilbur, Donald [Wilbur.Donald@epa.gov]  
**Sent:** 9/3/2019 1:42:12 PM  
**To:** Keigwin, Richard [Keigwin.Richard@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]  
**CC:** Vogel, Dana [Vogel.Dana@epa.gov]; Akerman, Gregory [Akerman.Gregory@epa.gov]  
**Subject:** FW: deliberative, draft, private, confidential - updated report on dose metrics  
**Attachments:** Pyrethroids PBPK model applications 09032019.docx

Here is the most recent version of the pyrethroids white paper dealing with the PBPK model utility from Cecilia. Please let us know what you think.

Thanks!

\*\*\*\*\*

Donald Wilbur  
Acting Deputy Director  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Health Effects Division (7509P)  
1200 Pennsylvania Ave NW  
Washington, DC 20460  
Telephone: (703)-347-8894  
Email: [Wilbur.Donald@epa.gov](mailto:Wilbur.Donald@epa.gov)

\*\*\*\*\*

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**From:** Tan, Cecilia <[Tan.Cecilia@epa.gov](mailto:Tan.Cecilia@epa.gov)>  
**Sent:** Tuesday, September 3, 2019 9:39 AM  
**To:** Wilbur, Donald <[Wilbur.Donald@epa.gov](mailto:Wilbur.Donald@epa.gov)>; Vogel, Dana <[Vogel.Dana@epa.gov](mailto:Vogel.Dana@epa.gov)>; Lowit, Anna <[Lowit.Anna@epa.gov](mailto:Lowit.Anna@epa.gov)>; Reaves, Elissa <[Reaves.Elissa@epa.gov](mailto:Reaves.Elissa@epa.gov)>; Akerman, Gregory <[Akerman.Gregory@epa.gov](mailto:Akerman.Gregory@epa.gov)>  
**Subject:** RE: deliberative, draft, private, confidential - updated report on dose metrics

Hi, Don,

I have addressed all Anna's comments and edited the document one more time. The attached file should be ready to share with Rick.

Thank you.

Cecilia

---

**From:** Wilbur, Donald <[Wilbur.Donald@epa.gov](mailto:Wilbur.Donald@epa.gov)>  
**Sent:** Tuesday, September 03, 2019 7:38 AM  
**To:** Tan, Cecilia <[Tan.Cecilia@epa.gov](mailto:Tan.Cecilia@epa.gov)>; Vogel, Dana <[Vogel.Dana@epa.gov](mailto:Vogel.Dana@epa.gov)>; Lowit, Anna <[Lowit.Anna@epa.gov](mailto:Lowit.Anna@epa.gov)>; Reaves, Elissa <[Reaves.Elissa@epa.gov](mailto:Reaves.Elissa@epa.gov)>; Akerman, Gregory <[Akerman.Gregory@epa.gov](mailto:Akerman.Gregory@epa.gov)>  
**Subject:** RE: deliberative, draft, private, confidential - updated report on dose metrics

Cecilia-

Rick indicated that he would like to see this letter. Can you look at Anna's comments and clean it up so that we can share it?

Thanks,

Don

\*\*\*\*\*

Donald Wilbur  
Acting Deputy Director  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Health Effects Division (7509P)  
1200 Pennsylvania Ave NW  
Washington, DC 20460  
Telephone: (703)-347-8894  
Email: [Wilbur.Donald@epa.gov](mailto:Wilbur.Donald@epa.gov)

\*\*\*\*\*

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Message

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**From:** Sherman, Kelly [Sherman.Kelly@epa.gov]  
**Sent:** 4/6/2020 10:49:17 AM  
**To:** Keigwin, Richard [Keigwin.Richard@epa.gov]  
**CC:** Vogel, Dana [Vogel.Dana@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Smith, Charles [Smith.Charles@epa.gov]; Akerman, Gregory [Akerman.Gregory@epa.gov]; Wilbur, Donald [Wilbur.Donald@epa.gov]; Craig, Evisabel [Craig.Evisabel@epa.gov]; Tan, Cecilia [Tan.Cecilia@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; Smith, Carolyn [smith.carolyn@epa.gov]; Mannix, Marianne [Mannix.Marianne@epa.gov]  
**Subject:** RE: HED Response to OCHP comments on the Pyrethroids FQPA white paper  
**Attachments:** HED RTC for OCHP\_April 2020.docx

Thanks, Rick.

Elissa or Dana – Attached are the comments, for you to send to OCHP.

Kelly Sherman  
Chief, Risk Management and Implementation Branch III (RMIB III)  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-8401

---

**From:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Sent:** Saturday, April 04, 2020 6:56 AM  
**To:** Sherman, Kelly <Sherman.Kelly@epa.gov>  
**Cc:** Vogel, Dana <Vogel.Dana@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Smith, Charles <Smith.Charles@epa.gov>; Akerman, Gregory <Akerman.Gregory@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Craig, Evisabel <Craig.Evisabel@epa.gov>; Tan, Cecilia <Tan.Cecilia@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>; Swartz, Christina <Swartz.Christina@epa.gov>; Smith, Carolyn <smith.carolyn@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>  
**Subject:** RE: HED Response to OCHP comments on the Pyrethroids FQPA white paper

Looks good. Since the incoming came from Rebecca, I think either Dana or Elissa can send this back to OCHP. Thanks everyone.

---

**From:** Sherman, Kelly <Sherman.Kelly@epa.gov>  
**Sent:** Friday, April 03, 2020 8:29 AM  
**To:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Cc:** Vogel, Dana <Vogel.Dana@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Smith, Charles <Smith.Charles@epa.gov>; Akerman, Gregory <Akerman.Gregory@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Craig, Evisabel <Craig.Evisabel@epa.gov>; Tan, Cecilia <Tan.Cecilia@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>; Swartz, Christina <Swartz.Christina@epa.gov>; Smith, Carolyn <smith.carolyn@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>  
**Subject:** FW: HED Response to OCHP comments on the Pyrethroids FQPA white paper

Hi Rick,

For your review, attached are HED's draft responses to OCHP's comments on the FQPA Safety Factor reduction for the pyrethroids. Also attached are OCHP's comments.

Thanks,  
Kelly

Kelly Sherman  
Chief, Risk Management and Implementation Branch III (RMIB III)  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-8401

---

**From:** Dzubow, Rebecca <[Dzubow.Rebecca@epa.gov](mailto:Dzubow.Rebecca@epa.gov)>  
**Sent:** Friday, March 06, 2020 5:33 PM  
**To:** Sherman, Kelly <[Sherman.Kelly@epa.gov](mailto:Sherman.Kelly@epa.gov)>; Mannix, Marianne <[Mannix.Marianne@epa.gov](mailto:Mannix.Marianne@epa.gov)>  
**Cc:** Vogel, Dana <[Vogel.Dana@epa.gov](mailto:Vogel.Dana@epa.gov)>; Friedman, Dana <[Friedman.Dana@epa.gov](mailto:Friedman.Dana@epa.gov)>; Smith, Carolyn <[smith.carolyn@epa.gov](mailto:smith.carolyn@epa.gov)>; Brinkerhoff, Chris <[Brinkerhoff.Chris@epa.gov](mailto:Brinkerhoff.Chris@epa.gov)>; Schroeder, Kathleen <[Schroeder.Kathleen@epa.gov](mailto:Schroeder.Kathleen@epa.gov)>  
**Subject:** RE: pyrethroids briefing follow-up

Hi Kelly,

OCHP thanks OPP for allowing for input on the *Re-Evaluation of the FQPA Safety Factor for Pyrethroids* and supporting documents. We appreciate the extended time provided to put our comments together and look forward to discussing them with you.

## Ex. 5 Deliberative Process (DP)

Please see the attached for more detailed comments on this main topic and a few others. We would be happy to discuss any of our comments further.

Thank you,  
Rebecca

---

Rebecca C. Dzubow, MPH, MEM  
Division Director  
U.S. EPA Office of Children's Health Protection | Regulatory Support and Science Policy Division  
1200 Pennsylvania Avenue, NW (1107T) | Washington, DC 20460  
(202) 564-0967

---

**From:** Sherman, Kelly  
**Sent:** Thursday, April 02, 2020 4:24 PM  
**To:** Swartz, Christina <[Swartz.Christina@epa.gov](mailto:Swartz.Christina@epa.gov)>

**Cc:** Smith, Carolyn <[smith.carolyn@epa.gov](mailto:smith.carolyn@epa.gov)>; Mannix, Marianne <[Mannix.Marianne@epa.gov](mailto:Mannix.Marianne@epa.gov)>; Jakob, Avivah <[Jakob.Avivah@epa.gov](mailto:Jakob.Avivah@epa.gov)>; Reaves, Elissa <[Reaves.Elissa@epa.gov](mailto:Reaves.Elissa@epa.gov)>; Vogel, Dana <[Vogel.Dana@epa.gov](mailto:Vogel.Dana@epa.gov)>; Akerman, Gregory <[Akerman.Gregory@epa.gov](mailto:Akerman.Gregory@epa.gov)>; Wilbur, Donald <[Wilbur.Donald@epa.gov](mailto:Wilbur.Donald@epa.gov)>; Craig, Evisabel <[Craig.Evisabel@epa.gov](mailto:Craig.Evisabel@epa.gov)>; Tan, Cecilia <[Tan.Cecilia@epa.gov](mailto:Tan.Cecilia@epa.gov)>; Lowit, Anna <[Lowit.Anna@epa.gov](mailto:Lowit.Anna@epa.gov)>; Smith, Charles <[Smith.Charles@epa.gov](mailto:Smith.Charles@epa.gov)>

**Subject:** RE: HED Response to OCHP comments on the Pyrethroids FQPA white paper

Hi Christina,

Thanks for sending the attached responses to OCHP's comments on the FQPA safety factor reduction for the pyrethroids.

Should I send HED's response to Rebecca at OCHP via email? Does Rick need to be updated before I send the responses forward? (Or has he already heard about this? Is that necessary?)

Thanks,  
Kelly

Kelly Sherman  
Chief, Risk Management and Implementation Branch III (RMIB III)  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-8401

---

**From:** Swartz, Christina <[Swartz.Christina@epa.gov](mailto:Swartz.Christina@epa.gov)>

**Sent:** Wednesday, April 01, 2020 6:07 PM

**To:** Sherman, Kelly <[Sherman.Kelly@epa.gov](mailto:Sherman.Kelly@epa.gov)>

**Cc:** Smith, Carolyn <[smith.carolyn@epa.gov](mailto:smith.carolyn@epa.gov)>; Mannix, Marianne <[Mannix.Marianne@epa.gov](mailto:Mannix.Marianne@epa.gov)>; Jakob, Avivah <[Jakob.Avivah@epa.gov](mailto:Jakob.Avivah@epa.gov)>; Reaves, Elissa <[Reaves.Elissa@epa.gov](mailto:Reaves.Elissa@epa.gov)>; Vogel, Dana <[Vogel.Dana@epa.gov](mailto:Vogel.Dana@epa.gov)>; Akerman, Gregory <[Akerman.Gregory@epa.gov](mailto:Akerman.Gregory@epa.gov)>; Wilbur, Donald <[Wilbur.Donald@epa.gov](mailto:Wilbur.Donald@epa.gov)>; Craig, Evisabel <[Craig.Evisabel@epa.gov](mailto:Craig.Evisabel@epa.gov)>; Tan, Cecilia <[Tan.Cecilia@epa.gov](mailto:Tan.Cecilia@epa.gov)>; Lowit, Anna <[Lowit.Anna@epa.gov](mailto:Lowit.Anna@epa.gov)>

**Subject:** HED Response to OCHP comments on the Pyrethroids FQPA white paper

Kelly, all,  
Please see attached – HED's response to the OCHP comments on the pyrethroids FQPA white paper.

If you have any additional questions, please let us know.

Best,  
Christina

---

Christina Swartz  
Chief, Risk Assessment Branch II  
Health Effects Division (Mail Code 7509P)  
Office of Pesticide Programs  
US Environmental Protection Agency  
Office Phone: 703 305 5877  
[Swartz.Christina@epa.gov](mailto:Swartz.Christina@epa.gov)

Message

---

**From:** Sherman, Kelly [Sherman.Kelly@epa.gov]  
**Sent:** 4/3/2020 12:28:34 PM  
**To:** Keigwin, Richard [Keigwin.Richard@epa.gov]  
**CC:** Vogel, Dana [Vogel.Dana@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Smith, Charles [Smith.Charles@epa.gov]; Akerman, Gregory [Akerman.Gregory@epa.gov]; Wilbur, Donald [Wilbur.Donald@epa.gov]; Craig, Evisabel [Craig.Evisabel@epa.gov]; Tan, Cecilia [Tan.Cecilia@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; Smith, Carolyn [smith.carolyn@epa.gov]; Mannix, Marianne [Mannix.Marianne@epa.gov]  
**Subject:** FW: HED Response to OCHP comments on the Pyrethroids FQPA white paper  
**Attachments:** HED RTC for OCHP\_April 2020.docx; pyrethroids FQPA SF comments OCHP\_03-6-2020.docx

Hi Rick,

For your review, attached are HED's draft responses to OCHP's comments on the FQPA Safety Factor reduction for the pyrethroids. Also attached are OCHP's comments.

Thanks,  
Kelly

Kelly Sherman  
Chief, Risk Management and Implementation Branch III (RMIB III)  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-8401

---

**From:** Dzubow, Rebecca <Dzubow.Rebecca@epa.gov>  
**Sent:** Friday, March 06, 2020 5:33 PM  
**To:** Sherman, Kelly <Sherman.Kelly@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>  
**Cc:** Vogel, Dana <Vogel.Dana@epa.gov>; Friedman, Dana <Friedman.Dana@epa.gov>; Smith, Carolyn <smith.carolyn@epa.gov>; Brinkerhoff, Chris <Brinkerhoff.Chris@epa.gov>; Schroeder, Kathleen <Schroeder.Kathleen@epa.gov>  
**Subject:** RE: pyrethroids briefing follow-up

Hi Kelly,

OCHP thanks OPP for allowing for input on the *Re-Evaluation of the FQPA Safety Factor for Pyrethroids* and supporting documents. We appreciate the extended time provided to put our comments together and look forward to discussing them with you.

## Ex. 5 Deliberative Process (DP)

# Ex. 5 Deliberative Process (DP)

Please see the attached for more detailed comments on this main topic and a few others. We would be happy to discuss any of our comments further.

Thank you,  
Rebecca

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Rebecca C. Dzubow, MPH, MEM

*Division Director*

U.S. EPA Office of Children's Health Protection | Regulatory Support and Science Policy Division  
1200 Pennsylvania Avenue, NW (1107T) | Washington, DC 20460  
(202) 564-0967

---

**From:** Sherman, Kelly

**Sent:** Thursday, April 02, 2020 4:24 PM

**To:** Swartz, Christina <Swartz.Christina@epa.gov>

**Cc:** Smith, Carolyn <smith.carolyn@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>; Jakob, Avivah <Jakob.Avivah@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Akerman, Gregory <Akerman.Gregory@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Craig, Evisabel <Craig.Evisabel@epa.gov>; Tan, Cecilia <Tan.Cecilia@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>; Smith, Charles <Smith.Charles@epa.gov>

**Subject:** RE: HED Response to OCHP comments on the Pyrethroids FQPA white paper

Hi Christina,

Thanks for sending the attached responses to OCHP's comments on the FQPA safety factor reduction for the pyrethroids.

Should I send HED's response to Rebecca at OCHP via email? Does Rick need to be updated before I send the responses forward? (Or has he already heard about this? Is that necessary?)

Thanks,  
Kelly

Kelly Sherman  
Chief, Risk Management and Implementation Branch III (RMIB III)  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-8401

---

**From:** Swartz, Christina <Swartz.Christina@epa.gov>

**Sent:** Wednesday, April 01, 2020 6:07 PM

**To:** Sherman, Kelly <Sherman.Kelly@epa.gov>

**Cc:** Smith, Carolyn <smith.carolyn@epa.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>; Jakob, Avivah <Jakob.Avivah@epa.gov>; Reaves, Elissa <Reaves.Elissa@epa.gov>; Vogel, Dana <Vogel.Dana@epa.gov>; Akerman, Gregory <Akerman.Gregory@epa.gov>; Wilbur, Donald <Wilbur.Donald@epa.gov>; Craig, Evisabel <Craig.Evisabel@epa.gov>; Tan, Cecilia <Tan.Cecilia@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>

**Subject:** HED Response to OCHP comments on the Pyrethroids FQPA white paper



Kelly, all,  
Please see attached – HED's response to the OCHP comments on the pyrethroids FQPA white paper.

If you have any additional questions, please let us know.

Best,  
Christina

---

Christina Swartz  
Chief, Risk Assessment Branch II  
Health Effects Division (Mail Code 7509P)  
Office of Pesticide Programs  
US Environmental Protection Agency  
Office Phone: 703 305 5877  
[Swartz.Christina@epa.gov](mailto:Swartz.Christina@epa.gov)

## Appointment

---

**From:** Keigwin, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=151BAABB6A2246A3A312F12A706C0A05-RICHARD P KEIGWIN JR]  
**Sent:** 12/2/2019 12:42:53 PM  
**To:** Messina, Edward [Messina.Edward@epa.gov]  
**Subject:** FW: Pyrethroids - PBPK Model Applicability  
**Location:** 3156 WJC EAST **Conference Call in Number / Ex. 6**  
**Start:** 12/3/2019 7:00:00 PM  
**End:** 12/3/2019 8:00:00 PM  
**Show Time As:** Tentative

-----Original Appointment-----

**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Tuesday, November 19, 2019 1:24 PM  
**To:** Dunn, Alexandra; Keigwin, Richard; Smith, Charles; Reaves, Elissa; Vogel, Dana; Sherman, Kelly; Swartz, Christina; Tan, Cecilia; Lowit, Anna; Craig, Evisabel; Metzger, Michael; VanAlstine, Julie; Olinger, Christine; Myers, Tom; Rickard, Kristin; Perron, Monique; Jakob, Avivah; Smith, Carolyn; Evans, Elizabeth; Bennett, Isabella; Siedschlag, Gregory; Mosby, Jackie; Dinkins, Darlene; Bennett, Tate; Mills, William T.  
**Cc:** Wilbur, Donald; Dawson, Jeffrey; Fischer, David  
**Subject:** Pyrethroids - PBPK Model Applicability  
**When:** Tuesday, December 03, 2019 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** 3156 WJC EAST **Conference Call in Number / Ex. 6**

To brief the OCSP-IO on the applicability of pyrethroid PBPK data on the entire class of pyrethroids, which includes the FQPA safety factor decision that applies to all pyrethroids, as well as the newer determination that the PBPK model is only appropriate for determining toxicity Points of Departure for the pyrethroids on which the modeling was conducted, not applied across the entire class of pyrethroids.

## Appointment

---

**From:** Keigwin, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=151BAABB6A2246A3A312F12A706C0A05-RICHARD P KEIGWIN JR]  
**Sent:** 11/26/2019 12:54:43 PM  
**To:** Dawson, Jeffrey [Dawson.Jeff@epa.gov]  
**Subject:** FW: Pyrethroids - PBPK Model Applicability  
**Location:** 3156 WJC EAST **Conference Call in Number / Ex. 6**  
**Start:** 12/3/2019 7:00:00 PM  
**End:** 12/3/2019 8:00:00 PM  
**Show Time As:** Tentative

-----Original Appointment-----

**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Tuesday, November 19, 2019 1:24 PM  
**To:** Dunn, Alexandra; Keigwin, Richard; Smith, Charles; Reaves, Elissa; Vogel, Dana; Sherman, Kelly; Swartz, Christina; Tan, Cecilia; Lowit, Anna; Craig, Evisabel; Metzger, Michael; VanAlstine, Julie; Olinger, Christine; Myers, Tom; Rickard, Kristin; Perron, Monique; Jakob, Avivah; Smith, Carolyn; Evans, Elizabeth; Bennett, Isabella; Siedschlag, Gregory; Mosby, Jackie; Dinkins, Darlene; Bennett, Tate; Mills, William T.  
**Cc:** Wilbur, Donald  
**Subject:** Pyrethroids - PBPK Model Applicability  
**When:** Tuesday, December 03, 2019 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** 3156 WJC EAST **Conference Call in Number / Ex. 6**

To brief the OCSP-IO on the applicability of pyrethroid PBPK data on the entire class of pyrethroids, which includes the FQPA safety factor decision that applies to all pyrethroids, as well as the newer determination that the PBPK model is only appropriate for determining toxicity Points of Departure for the pyrethroids on which the modeling was conducted, not applied across the entire class of pyrethroids.

## Message

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**From:** Keigwin, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=151BAABB6A2246A3A312F12A706C0A05-RICHARD P KEIGWIN JR]  
**Sent:** 8/5/2019 8:16:46 PM  
**To:** Anna Lowit (Lowit.Anna@epa.gov) [Lowit.Anna@epa.gov]; Dana Vogel (Vogel.Dana@epa.gov) [Vogel.Dana@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]  
**Subject:** FW: Let's get ready to respond to this....I may get an inquiry ASAP

FYI

---

**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Monday, August 05, 2019 4:14 PM  
**To:** Daguiard, Robert <Daguiard.Robert@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>  
**Cc:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Kadeli, Lek <Kadeli.Lek@epa.gov>  
**Subject:** Let's get ready to respond to this....I may get an inquiry ASAP

News

# EPA Shrinks Childrens' Safety Margin for Class of Pesticides

Posted Aug. 2, 2019, 5:52 PM  
By Adam Allington

- Pyrethroids are common agricultural and household insecticides
- EPA says new data shows no need for extra protective factor for children

The Environmental Protection Agency is removing childrens' protections from a common class of pesticides because it says they are no longer warranted.

The change means the agency believes that risk standards set for adults for the pyrethroid class of pesticides are protective of kids.

Pyrethroids are the synthetic versions of pyrethrin insecticides, which are naturally derived from chrysanthemum flowers. "Based on a thorough review of recent data, EPA concluded that there are reliable data to support reducing the current threefold (3X) Food Quality Protection Act (FQPA) safety factor for pyrethroids to 1X (one fold), and that margin will be safe for infants and children," EPA said in a press release.

The safety factors are used under that pesticide law when calculating risk standards, which translate into "tolerances," or the amounts that can be applied and allowed as residues on food.

Pyrethrins are found in over 3,500 registered pesticide products, many of which have common home garden or crop applications. They're also used on pets as flea and tick treatments.

Pyrethroids are used on ornamental plants, to control mosquitoes, and on fruit and nut crops including apple, pear, almond and citrus.

The 1996 FQPA requires EPA to apply up to an additional tenfold safety factor when setting or reassessing allowable pesticide residues for vulnerable populations such as children—unless adequate data are available to support a different factor. Even when invoked, the agency can later remove the safety factor when data indicate children need no special protections.

## New Conclusion

The agency now says its new evaluation of studies—as well as data generated by the industry-backed Council for the Advancement of Pyrethroid Human Risk Assessment—shows that adult standards will protect children.

The council is supported by Bayer CropScience, Syngenta, and Valent BioSciences LLC, among other companies.

“The Agency concluded that the FQPA safety factor for pyrethroids should be reduced to 1X for all populations because the data indicate that there is no increased sensitivity, or in other words, there are no pharmacokinetic differences between adults and children,” the agency said.

The public won’t know what the exact acceptable dose level is until EPA makes human health risk documents for pyrethroids available later this year.

## **Causes for Potential Concern**

Pyrethrins act on the nervous system of insects that touch or eat it and are often mixed with another chemical to increase their impact. The fact that these are “naturally occurring” chemicals does not diminish their toxicity, scientists say.

“Cyanide is a natural chemical. Plenty of exceedingly toxic things come from natural products,” said Tina Levine, a former director of EPA’s Health Effects Division in the Office of Pesticide Programs. She served under both Republican and Democratic administrations before retiring in 2011.

In 2010 Levine said the agency felt there was sufficient reason to keep a threefold layer of protection for children from pyrethroids.

“Unless this new study shows there is no difference [between adults and children], I would be suspicious,” she said.

“By doing this EPA is sort of discounting some of that other evidence in humans,” said Alexis Temkin, a toxicologist at the Environmental Working Group, a Washington, D.C.-based health watchdog.

“When there is some evidence from human studies that links to harm in the developing brain, then I think there is really no reason to reduce the safety factor,” she said.

To contact the reporter on this story: Adam Allington in Washington at [aallington@bloombergenvironment.com](mailto:aallington@bloombergenvironment.com)

To contact the editors responsible for this story: Gregory Henderson at [ghenderson@bloombergenvironment.com](mailto:ghenderson@bloombergenvironment.com); Steven Gibb at [sgibb@bloombergenvironment.com](mailto:sgibb@bloombergenvironment.com)

Alexandra Dapolito Dunn, Esq.

Assistant Administrator

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

(202) 564-2910

[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

Message

---

**From:** Keigwin, Richard [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=151BAABB6A2246A3A312F12A706C0A05-RICHARD P KEIGWIN JR]  
**Sent:** 12/27/2019 11:33:57 PM  
**To:** Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]  
**Subject:** RE: AL-20-000-1569 Pyrethroids Senator Sanders Response  
**Attachments:** AL-20-000-1569 Sanders pyrethroids letter RPK.docx

Thanks Darlene. A few comments/suggestions in the attached.

---

**From:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>  
**Sent:** Friday, December 27, 2019 4:06 PM  
**To:** Messina, Edward <Messina.Edward@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Subject:** FW: AL-20-000-1569 Pyrethroids Senator Sanders Response

Please see attached the draft response to a letter from Sen. Bernie Sanders regarding the change in the safety factor for pyrethroids.

*Darlene Dinkins*  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
(703) 305-5214

---

**From:** Bennett, Isabella <Bennett.Isabella@epa.gov>  
**Sent:** Friday, December 20, 2019 9:31 AM  
**To:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Craine, William (Bob) <Craine.William@epa.gov>  
**Subject:** FW: AL-20-000-1569 Pyrethroids Senator Sanders Response

Hi Darlene,

As we discussed yesterday, the attached congressional letter (1569) is stuck in my CMS inbox under the "abort" error.

It was approved by Anna Lowit and is ready for OPP IO review.

Hi Bob,

Is there any way you can push this control into Darlene's box? It is stuck in my box with the "abort" error. There are a few more reviewers after her as well before the letter can close out.

Thank you both!  
Isabella

---

**From:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Sent:** Monday, December 16, 2019 12:46 PM  
**To:** Bennett, Isabella <Bennett.Isabella@epa.gov>  
**Subject:** RE: AL-20-000-1569 Pyrethroids Senator Sanders Response

Thanks Isabella. Here you go.

**Greg Siedschlag**

Chief, Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 319-7949  
<https://www.epa.gov/pesticides>

---

**From:** Bennett, Isabella <[Bennett.Isabella@epa.gov](mailto:Bennett.Isabella@epa.gov)>

**Sent:** Monday, December 16, 2019 10:14 AM

**To:** Siedschlag, Gregory <[Siedschlag.Gregory@epa.gov](mailto:Siedschlag.Gregory@epa.gov)>

**Subject:** AL-20-000-1569 Pyrethroids Senator Sanders Response

Hi Greg,

The pyrethroid congressional draft response is ready for your review. Approved by Anna Lowit. The response uses already approved language.

Review needed by COB today to keep on the established CMS congressional review timeline.

Thanks!

Isabella

*Isabella Bennett*

Communication Services Branch  
Field and External Affairs Division  
Office of Pesticide Programs  
Mobile: 703-213-7143  
Desk: 703-347-0415

Message

---

**From:** Keigwin, Richard [Keigwin.Richard@epa.gov]  
**Sent:** 1/13/2020 9:49:45 PM  
**To:** Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]  
**CC:** Messina, Edward [Messina.Edward@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]; Han, Kaythi [Han.Kaythi@epa.gov]; Naimy, Nina [Naimy.Nina@epa.gov]  
**Subject:** Re: FOR OPP IO REVIEW: Pyrethroid PBPK white paper desk statement  
**Attachments:** pyrethroid 2nd white paper desk statement\_KS\_CS 1-8-20.docx; ATT00001.htm

Looks fine to me.

Rick Keigwin  
Director, Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: 703-305-7090  
Website: [www.epa.gov/pesticides](http://www.epa.gov/pesticides)  
Sent from my iPhone (Please excuse typos!)

On Jan 13, 2020, at 10:12 AM, Siedschlag, Gregory <Siedschlag.Gregory@epa.gov> wrote:

Hello,

Please see the attachment for our internal desk statement on the PBPK white paper for your review.

We don't think this needs to go up to OCSPP – we can just keep it internal to OPP in case we're asked about it. If you think we should send up to Cheryl, let us know.

Best,

**Greg Siedschlag**  
Chief, Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 319-7949  
<https://www.epa.gov/pesticides>



Message

---

**From:** Keigwin, Richard [Keigwin.Richard@epa.gov]  
**Sent:** 10/24/2019 10:06:22 AM  
**To:** Wilbur, Donald [Wilbur.Donald@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]  
**CC:** Akerman, Gregory [Akerman.Gregory@epa.gov]  
**Subject:** RE: Agenda items for OD general at 8 am tomorrow

Thought the agenda looked a little light. See you at 8am.

-----Original Message-----

**From:** Wilbur, Donald <Wilbur.Donald@epa.gov>  
**Sent:** Thursday, October 24, 2019 6:02 AM  
**To:** Vogel, Dana <Vogel.Dana@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>  
**Cc:** Akerman, Gregory <Akerman.Gregory@epa.gov>  
**Subject:** RE: Agenda items for OD general at 8 am tomorrow

Blame me - there are couple more - here is the complete list:

PBPK guest editor on journal article - Cecilia ILMERAC (International Liaison Group for Methods on Risk Assessment of Chemicals in Food) - Evisabel observer Pyrethroid FQPA SF briefing - CSB then Alex BPPD - 8 essential oils issue OCHP involvement

\*\*\*\*\*

Donald Wilbur  
Acting Deputy Director  
U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Health Effects Division (7509P)  
1200 Pennsylvania Ave NW  
Washington, DC 20460  
Telephone: (703)-347-8894  
Email: Wilbur.Donald@epa.gov

\*\*\*\*\*

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential, deliberative, internal, and/or privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

-----Original Message-----

**From:** Vogel, Dana <Vogel.Dana@epa.gov>  
**Sent:** Wednesday, October 23, 2019 4:49 PM  
**To:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>  
**Cc:** Wilbur, Donald <Wilbur.Donald@epa.gov>; Akerman, Gregory <Akerman.Gregory@epa.gov>  
**Subject:** Agenda items for OD general at 8 am tomorrow

- Pyrethroid FQPA SF briefing - CSB then Alex
- BPPD - 8 essential oils issue

Message

**From:** Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]  
**Sent:** 11/7/2019 6:21:59 PM  
**To:** Bennett, Isabella [Bennett.Isabella@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Miller, Wynne [Miller.Wynne@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]  
**CC:** Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Evans, Elizabeth [Evans.Elizabeth@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Huskey, Angela [Huskey.Angela@epa.gov]  
**Subject:** RE: Pyrethroid/pyrethrin comms -- review needed by noon  
**Attachments:** RE: Pyrethroid/pyrethrin comms -- review needed by noon

We've reviewed and revised the comms where necessary to say additional 10x.

In the interest of time, I'm sending these on to Kaythi now, but let me know if you have additional concerns.

**Greg Siedschlag**

Chief, Communication Services Branch  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Phone: (703) 603-9044  
Cell: (571) 319-7949  
<https://www.epa.gov/pesticides>

---

**From:** Bennett, Isabella <Bennett.Isabella@epa.gov>  
**Sent:** Thursday, November 07, 2019 11:13 AM  
**To:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>  
**Cc:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Evans, Elizabeth <Evans.Elizabeth@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>; Huskey, Angela <Huskey.Angela@epa.gov>  
**Subject:** RE: Pyrethroid/pyrethrin comms -- review needed by noon

Hi Rick,

Angela Huskey did review.

**Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

---

**From:** Keigwin, Richard <Keigwin.Richard@epa.gov>  
**Sent:** Thursday, November 07, 2019 11:07 AM  
**To:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>  
**Cc:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Bennett, Isabella <Bennett.Isabella@epa.gov>; Evans, Elizabeth <Evans.Elizabeth@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>  
**Subject:** RE: Pyrethroid/pyrethrin comms -- review needed by noon

**Ex. 5 Deliberative Process (DP)**

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**From:** Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>  
**Sent:** Thursday, November 07, 2019 10:41 AM  
**To:** Keigwin, Richard <Keigwin.Richard@epa.gov>; Miller, Wynne <Miller.Wynne@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>  
**Cc:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Bennett, Isabella <Bennett.Isabella@epa.gov>; Evans, Elizabeth

<Evans.Elizabeth@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>

**Subject:** Pyrethroid/pyrethrin comms -- review needed by noon

**Importance:** High

Hi everyone,

OCSPP IO is asking for the attached materials by noon. These have been reviewed PRD, HED, EFED and OGC.

Please note that I made a couple changes in the Q&As and the web content to some language that gave me a little pause from a risk comms standpoint. In the Q&A, for example, I changed this:

## Ex. 5 Deliberative Process (DP)

I've copied Liz and Isabella on this message. I'm in an interview from 11-12, so if we get your approval in that window, one of them will forward the materials to Kaythi.

Best,

**Greg Siedschlag**

Chief, Communication Services Branch

Office of Pesticide Programs

U.S. Environmental Protection Agency

Phone: (703) 603-9044

Cell: (571) 319-7949

<https://www.epa.gov/pesticides>

## Appointment

---

**From:** Dunn, Alexandra [dunn.alexandra@epa.gov]  
**Sent:** 12/2/2019 12:42:55 PM  
**To:** Dunn, Alexandra [dunn.alexandra@epa.gov]; Keigwin, Richard [Keigwin.Richard@epa.gov]; Smith, Charles [Smith.Charles@epa.gov]; Reaves, Elissa [Reaves.Elissa@epa.gov]; Vogel, Dana [Vogel.Dana@epa.gov]; Sherman, Kelly [Sherman.Kelly@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; Tan, Cecilia [Tan.Cecilia@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]; Craig, Evisabel [Craig.Evisabel@epa.gov]; Metzger, Michael [Metzger.Michael@epa.gov]; VanAlstine, Julie [VanAlstine.Julie@epa.gov]; Olinger, Christine [Olinger.Christine@epa.gov]; Myers, Tom [Myers.Tom@epa.gov]; Rickard, Kristin [Rickard.Kristin@epa.gov]; Perron, Monique [Perron.Monique@epa.gov]; Jakob, Avivah [Jakob.Avivah@epa.gov]; Smith, Carolyn [smith.carolyn@epa.gov]; Evans, Elizabeth [Evans.Elizabeth@epa.gov]; Bennett, Isabella [Bennett.Isabella@epa.gov]; Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]; Mosby, Jackie [Mosby.Jackie@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]; Mills, William T. [mills.williamt@epa.gov]  
**CC:** Wilbur, Donald [Wilbur.Donald@epa.gov]; Dawson, Jeffrey [Dawson.Jeff@epa.gov]; Fischer, David [Fischer.David@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]  
**Subject:** Pyrethroids - PBPK Model Applicability  
**Attachments:** Pyrethroid briefing for Alex Dunn-final for IO- dec 3 2019.pptx .pptx  
**Location:** 3156 WJC EAST **Ex. 6 | Conference Call In Number**  
**Start:** 12/3/2019 7:00:00 PM  
**End:** 12/3/2019 8:00:00 PM  
**Show Time As:** Busy

To brief the OCSPP-IO on the applicability of pyrethroid PBPK data on the entire class of pyrethroids, which includes the FQPA safety factor decision that applies to all pyrethroids, as well as the newer determination that the PBPK model is only appropriate for determining toxicity Points of Departure for the pyrethroids on which the modeling was conducted, not applied across the entire class of pyrethroids.



Pyrethroid briefing  
for Alex Dunn-fin...

Message

---

**From:** Keller, Kaitlin [keller.kaitlin@epa.gov]  
**Sent:** 11/7/2019 2:40:04 PM  
**To:** Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Dunn, Alexandra [dunn.alexandra@epa.gov]; Han, Kaythi [Han.Kaythi@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]  
**CC:** Daguillard, Robert [Daguillard.Robert@epa.gov]  
**Subject:** RE: comms on pyrethroids  
**Attachments:** Pyrethroids rvsd 11.6.2019.docx

Attaching an updated one pager to reflect Alex's edits from this morning (moved a few bullets up and added a line about the eco mitigation proposal). Please let me know if anything else is needed.

---

**From:** Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>  
**Sent:** Thursday, November 7, 2019 9:37 AM  
**To:** Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>  
**Cc:** Daguillard, Robert <Daguillard.Robert@epa.gov>  
**Subject:** RE: comms on pyrethroids

Alex -- Your frustration makes perfect sense. We are working here to figure out how to (1) obtain from the program offices the most accurate information in a timely manner; (2) track it in a sensible and dynamic way; and (3) convey it to you in plenty of time for us all to strategize about internal and external communications.

I hope you will begin to see results as early as next week.

Thank you for your patience and your candor. We will get this right.

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW, Room 3111A, EPA East  
Washington, DC 20450  
(202) 564-5489  
[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

---

**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>  
**Sent:** Thursday, November 07, 2019 8:15 AM  
**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>  
**Cc:** Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Keep me posted. Our comms meetings are not working well – this has now turned into a significant back and forth when during the meeting it was described as “sign, there’s no concern, it’s just eco assessment.” So I do not feel I am getting the most relevant advice.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

---

**From:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>  
**Sent:** Wednesday, November 6, 2019 6:57 PM  
**To:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>  
**Cc:** Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Wednesday evening update--

Draft comms consists of:

### **Ex. 5 Deliberative Process (DP)**

OPP asked OGC to review the draft comms for this. I've asked OPP to send me drafts by noon tomorrow and we plan on sharing the materials with OCHP at the briefing on the white paper tomorrow afternoon. My goal is to send you the draft materials tomorrow afternoon and to OPA latest by COB tomorrow.

For Friday when the FRN is available for public inspection, we will have the desk statement ready in case we receive any inquiries. However, as Kaitlin noted, the white paper is not referenced in the FRN as something that we are publishing for public comment, so it is unlikely we will receive press on the safety factor on Friday.

## **Ex. 5 Deliberative Process (DP)**

Nancy Grantham is aware that the FRN will be available for public inspection on 11/8. She asked if the administrator knows that this action is happening this week. I relayed that pyrethroids were included in last month's high-profile pesticides briefing, but I will also let her know when the administrator receives the 1-pager Kaitlin sent.

That's all the pyrethroids news I have at the moment. Will resume work on the moving parts tomorrow!

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>  
**Sent:** Wednesday, November 06, 2019 4:08 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>  
**Subject:** RE: comms on pyrethroids

## **Ex. 5 Deliberative Process (DP)**

# Ex. 5 Deliberative Process (DP)

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW, Room 3111A, EPA East  
Washington, DC 20450  
(202) 564-5489  
[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

---

**From:** Siciliano, CarolAnn  
**Sent:** Wednesday, November 06, 2019 3:21 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Thanks for letting us know. We're on it. (Happily, this is the pyrethroids PID addressing only eco risk; the HH/safety factor PID is set for December.)

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW, Room 3111A, EPA East  
Washington, DC 20450  
(202) 564-5489  
[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

---

**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>  
**Sent:** Wednesday, November 06, 2019 3:03 PM  
**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>  
**Subject:** comms on pyrethroids

I did push this one to the FR; want to make sure we have any comms ready as on the hot pesticide list.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency

(202) 564-2910

[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)



Message

---

**From:** Grable, Melissa [Grable.Melissa@epa.gov]  
**Sent:** 4/21/2020 7:02:57 PM  
**To:** Dunn, Alexandra [dunn.alexandra@epa.gov]  
**CC:** Tyler, Tom [Tyler.Tom@epa.gov]; Giddings, Daniel [giddings.daniel@epa.gov]  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids  
**Attachments:** AL-20-000-1569 Sanders pyrethroids letter\_ready for signature.pdf

Alex,

Attached is the Sen. Sanders response prepared for your signature. I am hoping that the date is auto-populated in case you don't get a chance to sign it today, but if you do need me to change the date, please let me know. I have another letter that will be coming soon also for your signature.

Thanks,  
Melissa

---

**From:** Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>  
**Sent:** Monday, April 13, 2020 1:57 PM  
**To:** Grable, Melissa <Grable.Melissa@epa.gov>  
**Subject:** RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Melissa - Revised version looks ok. Thanks,  
Sven

Sven-Erik Kaiser  
U.S. EPA  
Office of Congressional and Intergovernmental Relations  
1200 Pennsylvania Ave., NW (1305A)  
Washington, DC 20460  
202-566-2753 (o)  
202-591-0619 (c)

---

**From:** Grable, Melissa  
**Sent:** Monday, April 13, 2020 12:56 PM  
**To:** Kaiser, Sven-Erik <Kaiser.Sven-Erik@epa.gov>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Sven,

Back on February 21 you cleared this response to Sen. Sanders re: pyrethroids. When it was routed for final signature, we received additional comments which just made their way through Alex for her review. As a result, it is back with OCIR for review again. Please take a look and let me know if OCIR has any comments for if this is ready for final signature (again). Attached is the incoming letter, the marked up version and a clean version for your review.

I recognize that we will need to get this on the letterhead you provided.

Thanks,  
Melissa

---

**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Monday, April 13, 2020 12:48 PM

**To:** Tyler, Tom <Tyler.Tom@epa.gov>  
**Cc:** Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>  
**Subject:** RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

This answer is cleared to go to Sven and OCIR!

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
US Environmental Protection Agency  
Washington, DC

---

**From:** Tyler, Tom <Tyler.Tom@epa.gov>  
**Sent:** Sunday, April 12, 2020 8:23 PM  
**To:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Cc:** Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi, Alex –

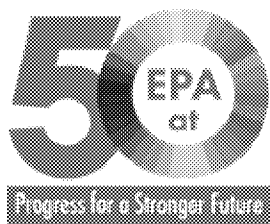
It turned out that no pages were missing from the inbound. I'm sorry if I didn't get that word to you and it made you pause.

Is this still with you? If so, do you need, or would you like us to do, anything else?

Thanks!

Tom

**Tom Tyler, Chief of Staff**  
Office of Chemical Safety and Pollution Prevention  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue NW (MC 7101M), Washington, DC 20460  
w202.566.0808 c202.770.6608 [tyler.tom@epa.gov](mailto:tyler.tom@epa.gov) OCSPP/IO 3148A East



---

**From:** Tyler, Tom <Tyler.Tom@epa.gov>  
**Sent:** Monday, March 30, 2020 3:12 PM  
**To:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Cc:** Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Alex, OPP has modified the attached letter and I have signed off. The attachments have "show changes" and "clean" versions. The original letter is partly missing in CMS, so we're trying to track that down, but I do believe the new draft is responsive.

Danny/Ruth, Please add to Alex's eBinder, or however you handle correspondence coming in for review.

Thanks!

Tom

**Tom Tyler, Chief of Staff**

Office of Chemical Safety and Pollution Prevention

United States Environmental Protection Agency

1200 Pennsylvania Avenue NW (MC 7101M), Washington, DC 20460

w202.566.0808 c202.770.6608 [tyler.tom@epa.gov](mailto:tyler.tom@epa.gov) OCSPP/IO 3148A East

---

**From:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>

**Sent:** Monday, March 30, 2020 1:53 PM

**To:** Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Subject:** RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Tom,

I am working on trying to get some correspondence items moving again. First up is the Sen. Sanders letter on pyrethroids. This was on its way for final signature when I received the following comments:

## Ex. 5 Deliberative Process (DP)

I made a few updates to the letter (see attached for a track changes version and a clean version) that I hope address the concerns above. I have also provided the incoming letter. If you are ok with the edits, please forward it to Alex for her review. Since this is back to draft, I assume that it will need to go back to OCIR for review again. So, once Alex is ok with it, I will send it back to Sven for his review.

Thanks,  
Melissa

---

**From:** Grable, Melissa

**Sent:** Thursday, February 27, 2020 8:56 PM

**To:** Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Tom,

You had asked for a few points on the issues with the Sanders response to share with Ruth, Danny, and Mary. Before I shared it with them, I wanted to make sure that I accurately captured your concerns:

## Ex. 5 Deliberative Process (DP)

If this accurately captures your concerns, I will share this information with Ruth, Danny, and Mary, and, of course, work with the program to make these edits. Who will be reviewing correspondence while you are out of the office?

Thanks,  
Melissa

---

**From:** Malloy, Marilyn <[Malloy.Marilyn@epa.gov](mailto:Malloy.Marilyn@epa.gov)>  
**Sent:** Tuesday, February 25, 2020 1:22 PM  
**To:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>  
**Cc:** Malloy, Marilyn <[Malloy.Marilyn@epa.gov](mailto:Malloy.Marilyn@epa.gov)>  
**Subject:** RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Melissa,

I placed the signature package in your chair. Please print out the control slip to be included in the signature package. I am currently unable to log into CMS.

Thanks much

Marilyn

---

**From:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>  
**Sent:** Friday, February 21, 2020 11:08 AM  
**To:** Malloy, Marilyn <[Malloy.Marilyn@epa.gov](mailto:Malloy.Marilyn@epa.gov)>  
**Cc:** Hanley, Mary <[Hanley.Mary@epa.gov](mailto:Hanley.Mary@epa.gov)>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Marilyn,

Would you please print the signature package for this Sen. Sanders letter which Sven cleared, and deliver the package to me (I sit just outside of Tom's office)? The attached version does not have any highlighted (live) links.

Thank you,  
Melissa

---

**From:** Kaiser, Sven-Erik <[Kaiser.Sven-Erik@epa.gov](mailto:Kaiser.Sven-Erik@epa.gov)>  
**Sent:** Friday, February 21, 2020 10:32 AM  
**To:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>; Hanley, Mary <[Hanley.Mary@epa.gov](mailto:Hanley.Mary@epa.gov)>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Cleared for PCSPP signature with no edits! Please make sure the final signed version doesn't have highlighted (live) links. Thanks,  
Sven

Sven-Erik Kaiser  
U.S. EPA  
Office of Congressional and Intergovernmental Relations  
1200 Pennsylvania Ave., NW (1305A)  
Washington, DC 20460  
202-566-2753 (o)  
202-591-0619 (c)

---

**From:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>  
**Sent:** Thursday, February 13, 2020 12:09 PM  
**To:** Kaiser, Sven-Erik <[Kaiser.Sven-Erik@epa.gov](mailto:Kaiser.Sven-Erik@epa.gov)>  
**Cc:** Hanley, Mary <[Hanley.Mary@epa.gov](mailto:Hanley.Mary@epa.gov)>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Sven,

Attached is the draft response (CMS# AL-20-000-1569) to Sen. Bernie Sanders, regarding his inquiry on pyrethroids.  
Please let me know if you have any edits or questions.

Thanks,  
Melissa

Melissa Grable, Special Assistant  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-5198

Message

---

**From:** Han, Kaythi [Han.Kaythi@epa.gov]  
**Sent:** 11/8/2019 2:24:33 PM  
**To:** Dunn, Alexandra [dunn.alexandra@epa.gov]  
**CC:** Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Daguiard, Robert [Daguiard.Robert@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]  
**Subject:** RE: comms on pyrethroids

Thank you, Alex. I'll keep moving this forward.

The FRN is available on Public Inspection now: <https://www.federalregister.gov/documents/2019/11/12/2019-24514/pesticide-registration-review-proposed-interim-decisions-for-several-pyrethroids>

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Friday, November 08, 2019 9:21 AM  
**To:** Han, Kaythi <Han.Kaythi@epa.gov>  
**Cc:** Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Daguiard, Robert <Daguiard.Robert@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>  
**Subject:** RE: comms on pyrethroids

The statement and backpocket Q&As are fine. I made a number of changes to the "factsheet". Ready for OPA.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

---

**From:** Han, Kaythi <Han.Kaythi@epa.gov>  
**Sent:** Thursday, November 7, 2019 5:56 PM  
**To:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Cc:** Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Daguiard, Robert <Daguiard.Robert@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>  
**Subject:** FW: comms on pyrethroids

Hi Alex,

Attached is the document containing the draft statement and backpocket questions on our action. I'm confirming edits to question 3 are accurate with OPP, but wanted to get this in front of you this evening. OPA has a heads up and has seen an earlier draft.

I recognize that this is not the model for comms development that we want to have in place. I'll work diligently to make sure this doesn't happen again.

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>  
**Sent:** Thursday, November 07, 2019 1:09 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>  
**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Alex-I understand and have revised the document to hopefully provide more clarity.

## Ex. 5 Deliberative Process (DP)

---

**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>  
**Sent:** Thursday, November 7, 2019 12:34 PM  
**To:** Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>  
**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

I'm sorry but this document gets more confusing each version. See my comments.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

---

**From:** Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>  
**Sent:** Thursday, November 7, 2019 9:40 AM  
**To:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>  
**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Attaching an updated one pager to reflect Alex's edits from this morning (moved a few bullets up and added a line about the eco mitigation proposal). Please let me know if anything else is needed.

---

**From:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>  
**Sent:** Thursday, November 7, 2019 9:37 AM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>

**Subject:** RE: comms on pyrethroids

Alex -- Your frustration makes perfect sense. We are working here to **Ex. 5 Deliberative Process (DP)**

## Ex. 5 Deliberative Process (DP)

I hope you will begin to see results as early as next week.

Thank you for your patience and your candor. We will get this right.

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW, Room 3111A, EPA East  
Washington, DC 20450  
(202) 564-5489  
[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

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**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>

**Sent:** Thursday, November 07, 2019 8:15 AM

**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>

**Subject:** RE: comms on pyrethroids

Keep me posted. Our comms meetings are not working well – this has now turned into a significant back and forth when during the meeting it was described **Ex. 5 Deliberative Process (DP)** So I do not feel I am getting the most relevant advice.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

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**From:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>

**Sent:** Wednesday, November 6, 2019 6:57 PM

**To:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>

**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>

**Subject:** RE: comms on pyrethroids

Wednesday evening update--

## Ex. 5 Deliberative Process (DP)



# Ex. 5 Deliberative Process (DP)

For the publication date, 11/12, we should update the web to clarify the white paper. **Do we want to send an email announcement as well?**

Nancy Grantham is aware that the FRN will be available for public inspection on 11/8. She asked if the administrator

## Ex. 5 Deliberative Process (DP)

That's all the pyrethroids news I have at the moment. Will resume work on the moving parts tomorrow!

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

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**From:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>

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**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>

**Subject:** RE: comms on pyrethroids

Alex -- We saw your note about the desk statement. Thank you. **IMPORTANT UPDATE:** This action does implicate the Safety Factor White Paper (which we relied on for the Eco PID).

We solicited comment on the Safety Factor White Paper in August. It's still on our webpage, and it will be in the Eco PID docket. So it's very much in play right now.

The Eco PID FR notice does not appear to refer to the Safety Factor White Paper, although we are triple checking.

Therefore, because of this Safety Factor dimension, we will be preparing Comms in anticipation of the Safety Factor criticism. We are informing OPA of this development. We will have materials to you tomorrow afternoon, in anticipation of FR Public Inspection on Friday.

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
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Washington, DC 20450  
(202) 564-5489  
[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

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**From:** Siciliano, CarolAnn  
**Sent:** Wednesday, November 06, 2019 3:21 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Thanks for letting us know. We're on it. (Happily, this is the pyrethroids PID addressing only eco risk; the HH/safety factor PID is set for December.)

Carol Ann Siciliano  
Senior Advisor  
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[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

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**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>  
**Sent:** Wednesday, November 06, 2019 3:03 PM  
**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>  
**Subject:** comms on pyrethroids

I did push this one to the FR; want to make sure we have any comms ready as on the hot pesticide list.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

Message

---

**From:** Grable, Melissa [Grable.Melissa@epa.gov]  
**Sent:** 4/13/2020 4:49:49 PM  
**To:** Dunn, Alexandra [dunn.alexandra@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]  
**CC:** Malloy, Ruth [malloy.ruth@epa.gov]  
**Subject:** RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Thanks. Will do.

---

**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Monday, April 13, 2020 12:48 PM  
**To:** Tyler, Tom <Tyler.Tom@epa.gov>  
**Cc:** Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>  
**Subject:** RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

This answer is cleared to go to Sven and OCIR!

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
US Environmental Protection Agency  
Washington, DC

---

**From:** Tyler, Tom <Tyler.Tom@epa.gov>  
**Sent:** Sunday, April 12, 2020 8:23 PM  
**To:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Cc:** Grable, Melissa <Grable.Melissa@epa.gov>; Malloy, Ruth <malloy.ruth@epa.gov>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi, Alex –

It turned out that no pages were missing from the inbound. I'm sorry if I didn't get that word to you and it made you pause.

Is this still with you? If so, do you need, or would you like us to do, anything else?

Thanks!

Tom

**Tom Tyler, Chief of Staff**  
Office of Chemical Safety and Pollution Prevention  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue NW (MC 7101M), Washington, DC 20460  
w202.566.0808 c202.770.6608 [tyler.tom@epa.gov](mailto:tyler.tom@epa.gov) OCSPP/IO 3148A East

# **Ex. 5 Deliberative Process (DP)**

**Ex. 5 Deliberative Process (DP)**

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**From:** Grable, Melissa  
**Sent:** Thursday, February 27, 2020 8:56 PM  
**To:** Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Tom,

You had asked for a few points on the issues with the Sanders response to share with Ruth, Danny, and Mary. Before I shared it with them, I wanted to make sure that I accurately captured your concerns:

## Ex. 5 Deliberative Process (DP)

If this accurately captures your concerns, I will share this information with Ruth, Danny, and Mary, and, of course, work with the program to make these edits. Who will be reviewing correspondence while you are out of the office?

Thanks,  
Melissa

---

**From:** Malloy, Marilyn <[Malloy.Marilyn@epa.gov](mailto:Malloy.Marilyn@epa.gov)>  
**Sent:** Tuesday, February 25, 2020 1:22 PM  
**To:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>  
**Cc:** Malloy, Marilyn <[Malloy.Marilyn@epa.gov](mailto:Malloy.Marilyn@epa.gov)>  
**Subject:** RE: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Melissa,

I placed the signature package in your chair. Please print out the control slip to be included in the signature package. I am currently unable to log into CMS.

Thanks much

Marilyn

---

**From:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>  
**Sent:** Friday, February 21, 2020 11:08 AM  
**To:** Malloy, Marilyn <[Malloy.Marilyn@epa.gov](mailto:Malloy.Marilyn@epa.gov)>  
**Cc:** Hanley, Mary <[Hanley.Mary@epa.gov](mailto:Hanley.Mary@epa.gov)>  
**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Marilyn,

Would you please print the signature package for this Sen. Sanders letter which Sven cleared, and deliver the package to me (I sit just outside of Tom's office)? The attached version does not have any highlighted (live) links.

Thank you,  
Melissa

---

**From:** Kaiser, Sven-Erik <[Kaiser.Sven-Erik@epa.gov](mailto:Kaiser.Sven-Erik@epa.gov)>

**Sent:** Friday, February 21, 2020 10:32 AM

**To:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>; Hanley, Mary <[Hanley.Mary@epa.gov](mailto:Hanley.Mary@epa.gov)>

**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Cleared for PCSPP signature with no edits! Please make sure the final signed version doesn't have highlighted (live) links. Thanks,  
Sven

Sven-Erik Kaiser

U.S. EPA

Office of Congressional and Intergovernmental Relations

1200 Pennsylvania Ave., NW (1305A)

Washington, DC 20460

202-566-2753 (o)

202-591-0619 (c)

---

**From:** Grable, Melissa <[Grable.Melissa@epa.gov](mailto:Grable.Melissa@epa.gov)>

**Sent:** Thursday, February 13, 2020 12:09 PM

**To:** Kaiser, Sven-Erik <[Kaiser.Sven-Erik@epa.gov](mailto:Kaiser.Sven-Erik@epa.gov)>

**Cc:** Hanley, Mary <[Hanley.Mary@epa.gov](mailto:Hanley.Mary@epa.gov)>

**Subject:** FW: CMS AL-20-000-1569 Sanders Response on Pyrethroids

Hi Sven,

Attached is the draft response (CMS# AL-20-000-1569) to Sen. Bernie Sanders, regarding his inquiry on pyrethroids. Please let me know if you have any edits or questions.

Thanks,

Melissa

Melissa Grable, Special Assistant

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

(202) 564-5198

Message

---

**From:** Han, Kaythi [Han.Kaythi@epa.gov]  
**Sent:** 11/7/2019 10:55:54 PM  
**To:** Dunn, Alexandra [dunn.alexandra@epa.gov]  
**CC:** Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Daguillard, Robert [Daguillard.Robert@epa.gov]; Keller, Kaitlin [keller.kaitlin@epa.gov]  
**Subject:** FW: comms on pyrethroids  
**Attachments:** Pyrethroids rvsd 11.6.2019addkk.docx; Pyrethroids and Pyrethrins Statement and Backpocket QAs 11-7-19.docx

Hi Alex,

Attached is the document containing the draft statement and backpocket questions on our action. I'm confirming edits to question 3 are accurate with OPP, but wanted to get this in front of you this evening. OPA has a heads up and has seen an earlier draft.

I recognize that this is not the model for comms development that we want to have in place. I'll work diligently to make sure this doesn't happen again.

Kaythi Han  
Acting Communications Director  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
(202) 564-6233 | [han.kaythi@epa.gov](mailto:han.kaythi@epa.gov)

---

**From:** Keller, Kaitlin <keller.kaitlin@epa.gov>  
**Sent:** Thursday, November 07, 2019 1:09 PM  
**To:** Dunn, Alexandra <dunn.alexandra@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>  
**Cc:** Daguillard, Robert <Daguillard.Robert@epa.gov>  
**Subject:** RE: comms on pyrethroids

Alex-I understand and have revised the document to hopefully provide more clarity.

## Ex. 5 Deliberative Process (DP)

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**From:** Dunn, Alexandra <dunn.alexandra@epa.gov>  
**Sent:** Thursday, November 7, 2019 12:34 PM  
**To:** Keller, Kaitlin <keller.kaitlin@epa.gov>; Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>  
**Cc:** Daguillard, Robert <Daguillard.Robert@epa.gov>  
**Subject:** RE: comms on pyrethroids

I'm sorry but this document gets more confusing each version. See my comments.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency

(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

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**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Attaching an updated one pager to reflect Alex's edits from this morning **Ex. 5 Deliberative Process (DP)**  
**Ex. 5 Deliberative Process (DP)**. Please let me know if anything else is needed.

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**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

## Ex. 5 Deliberative Process (DP)

I hope you will begin to see results as early as next week.

Thank you for your patience and your candor. We will get this right.

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
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**Cc:** Daguiard, Robert <[Daguiard.Robert@epa.gov](mailto:Daguiard.Robert@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Keep me posted. Our comms meetings are not working well – this has now turned into a significant back and forth when during the meeting it was described as “sign, there’s no concern, it’s just eco assessment.” So I do not feel I am getting the most relevant advice.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention



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**Subject:** RE: comms on pyrethroids

Wednesday evening update--

## Ex. 5 Deliberative Process (DP)

For the publication date, 11/12, we should update the web to clarify the white paper. **Do we want to send an email announcement as well?**

Nancy Grantham is aware that the FRN will be available for public inspection on 11/8. She asked if the administrator

### Ex. 5 Deliberative Process (DP)

profile

That's all the pyrethroids news I have at the moment. Will resume work on the moving parts tomorrow!

Kaythi Han  
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**Subject:** RE: comms on pyrethroids

Alex -- We saw your note about the desk statement. Thank you. **IMPORTANT UPDATE:** This action does implicate the Safety Factor White Paper (which we relied on for the Eco PID).

We solicited comment on the Safety Factor White Paper in August. It's still on our webpage, and it will be in the Eco PID docket. So it's very much in play right now.

The Eco PID FR notice does not appear to refer to the Safety Factor White Paper, although we are triple checking.

Therefore, because of this Safety Factor dimension, we will be preparing Comms in anticipation of the Safety Factor criticism. We are informing OPA of this development. We will have materials to you tomorrow afternoon, in anticipation of FR Public Inspection on Friday.

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., NW, Room 3111A, EPA East  
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[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

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**Sent:** Wednesday, November 06, 2019 3:21 PM

**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>

**Subject:** RE: comms on pyrethroids

Thanks for letting us know. We're on it. (Happily, this is the pyrethroids PID addressing only eco risk; the HH/safety factor PID is set for December.)

Carol Ann Siciliano  
Senior Advisor  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency  
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(202) 564-5489  
[siciliano.carolann@epa.gov](mailto:siciliano.carolann@epa.gov)

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**Sent:** Wednesday, November 06, 2019 3:03 PM

**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>

**Subject:** comms on pyrethroids

I did push this one to the FR; want to make sure we have any comms ready as on the hot pesticide list.

Alexandra Dapolito Dunn, Esq.  
Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
U.S. Environmental Protection Agency

(202) 564-2910

[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

Message

---

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**Sent:** 11/7/2019 5:34:10 PM  
**To:** Keller, Kaitlin [keller.kaitlin@epa.gov]; Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Han, Kaythi [Han.Kaythi@epa.gov]; Dunton, Cheryl [Dunton.Cheryl@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]  
**CC:** Daguiard, Robert [Daguiard.Robert@epa.gov]  
**Subject:** RE: comms on pyrethroids  
**Attachments:** Pyrethroids rvsd 11.6.2019add.docx

**Importance:** High

I'm sorry but this document gets more confusing each version. See my comments.

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(202) 564-2910  
[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)

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**From:** Keller, Kaitlin <keller.kaitlin@epa.gov>  
**Sent:** Thursday, November 7, 2019 9:40 AM  
**To:** Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>; Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>  
**Cc:** Daguiard, Robert <Daguiard.Robert@epa.gov>  
**Subject:** RE: comms on pyrethroids

Attaching an updated one pager to reflect Alex's edits from this morning (moved a few bullets up and added a line about the eco mitigation proposal). Please let me know if anything else is needed.

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**From:** Siciliano, CarolAnn <Siciliano.CarolAnn@epa.gov>  
**Sent:** Thursday, November 7, 2019 9:37 AM  
**To:** Dunn, Alexandra <dunn.alexandra@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Dunton, Cheryl <Dunton.Cheryl@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>  
**Cc:** Daguiard, Robert <Daguiard.Robert@epa.gov>  
**Subject:** RE: comms on pyrethroids

Alex -- Your frustration makes perfect sense. We are working here to figure out how to (1) obtain from the program offices the most accurate information in a timely manner; (2) track it in a sensible and dynamic way; and (3) convey it to you in plenty of time for us all to strategize about internal and external communications.

I hope you will begin to see results as early as next week.

Thank you for your patience and your candor. We will get this right.

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**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>

**Sent:** Thursday, November 07, 2019 8:15 AM

**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>; Tyler, Tom <[Tyler.Tom@epa.gov](mailto:Tyler.Tom@epa.gov)>

**Cc:** Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>

**Subject:** RE: comms on pyrethroids

Keep me posted. Our comms meetings are not working well – this has now turned into a significant back and forth when during the meeting it was described as “sign, there’s no concern, it’s just eco assessment.” So I do not feel I am getting the most relevant advice.

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**From:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>

**Sent:** Wednesday, November 6, 2019 6:57 PM

**To:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>

**Cc:** Daguillard, Robert <[Daguillard.Robert@epa.gov](mailto:Daguillard.Robert@epa.gov)>

**Subject:** RE: comms on pyrethroids

Wednesday evening update--

Draft comms consists of:

- 1) desk statement
- 2) web edits clarifying the FQPA safety factor
- 3) email announcement
- 4) backpocket Q/As

OPP asked OGC to review the draft comms for this. I’ve asked OPP to send me drafts by noon tomorrow and we plan on sharing the materials with OCHP at the briefing on the white paper tomorrow afternoon. My goal is to send you the draft materials tomorrow afternoon and to OPA latest by COB tomorrow.

For Friday when the FRN is available for public inspection, we will have the desk statement ready in case we receive any inquiries. However, as Kaitlin noted, the white paper is not referenced in the FRN as something that we are publishing for public comment, so it is unlikely we will receive press on the safety factor on Friday.

For the publication date, 11/12, we should update the web to clarify the white paper. **Do we want to send an email announcement as well?**

Nancy Grantham is aware that the FRN will be available for public inspection on 11/8. She asked if the administrator knows that this action is happening this week. I relayed that pyrethroids were included in last month’s high-profile pesticides briefing, but I will also let her know when the administrator receives the 1-pager Kaitlin sent.

That’s all the pyrethroids news I have at the moment. Will resume work on the moving parts tomorrow!

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**From:** Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>  
**Sent:** Wednesday, November 06, 2019 4:08 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>; Dunton, Cheryl <[Dunton.Cheryl@epa.gov](mailto:Dunton.Cheryl@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Alex -- We saw your note about the desk statement. Thank you. **IMPORTANT UPDATE:** This action does implicate the Safety Factor White Paper (which we relied on for the Eco PID).

We solicited comment on the Safety Factor White Paper in August. It's still on our webpage, and it will be in the Eco PID docket. So it's very much in play right now.

The Eco PID FR notice does not appear to refer to the Safety Factor White Paper, although we are triple checking.

Therefore, because of this Safety Factor dimension, we will be preparing Comms in anticipation of the Safety Factor criticism. We are informing OPA of this development. We will have materials to you tomorrow afternoon, in anticipation of FR Public Inspection on Friday.

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**From:** Siciliano, CarolAnn  
**Sent:** Wednesday, November 06, 2019 3:21 PM  
**To:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>; Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>  
**Subject:** RE: comms on pyrethroids

Thanks for letting us know. We're on it. (Happily, this is the pyrethroids PID addressing only eco risk; the HH/safety factor PID is set for December.)

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**From:** Dunn, Alexandra <[dunn.alexandra@epa.gov](mailto:dunn.alexandra@epa.gov)>

**Sent:** Wednesday, November 06, 2019 3:03 PM

**To:** Han, Kaythi <[Han.Kaythi@epa.gov](mailto:Han.Kaythi@epa.gov)>; Siciliano, CarolAnn <[Siciliano.CarolAnn@epa.gov](mailto:Siciliano.CarolAnn@epa.gov)>; Keller, Kaitlin <[keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov)>

**Subject:** comms on pyrethroids

I did push this one to the FR; want to make sure we have any comms ready as on the hot pesticide list.

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